

DRAFT

**Hassen Development Project (Site A)
Initial Study/Mitigated Negative Declaration**

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AC	Alternating Current
ACM	asbestos-containing materials
ac-ft/yr	acre-feet per year
ANSI	American National Standards Institute
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
Athens	Athens Services
bgs	below ground surface
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH ₄	methane
CHRIS	California Historical Resources Information System
CMP	congestion management program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CVUSD	Covina Valley Unified School District
dB	decibels
dBA	A-weighted decibel scale
DC	Direct Current
EAP	Energy Action Plan
ECHO	Enforcement and Compliance History Online
EIR	Environmental Impact Report
EMI	Emissions Inventory Data
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FID	Facility Inventory Database
FINDS	Facility Index System
GHG	greenhouse gas
gpd	gallons per day
GWP	global warming potential
HAZNET	Hazardous Waste Tracking System
HCM	Highway Capacity Manual

Acronym/Abbreviation	Definition
HMS	Hazardous Materials Search
HVAC	heating, ventilation, and air conditioning
Hz	hertz
I	Interstate
ICU	Intersection Capacity Utilization
IS	Initial Study
kBtu	kilo-British Thermal Units
kV	kilovolt
kW	kilowatt
kWh	kilowatt-hours
kWh/yr	kilowatt-hours per year
JWPCP	Joint Water Pollution Control Plant
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LACSD	Los Angeles County Sanitation District
LBP	lead-based paint
L_{dn}	day-night average noise level
Leighton	Leighton and Associates, Inc.
L_{eq}	equivalent noise level over a given period
LID	Low Impact Development
LLG	Linscott, Law, and Greenspan Engineers
L_{max}	maximum noise level
L_n	statistical sound level
LOS	level of service
LST	localized significance threshold
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
mg/kg	milligrams per kilogram
MND	Mitigated Negative Declaration
MS ₄	municipal separate stormwater sewer system
MT	metric tons
MWh	megawatt hour
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
PCB	polychlorinated biphenyls
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
PRIMP	Paleontological Resources Impact Mitigation Program

Acronym/Abbreviation	Definition
RCNM	Roadway Construction Noise Model
RCRA-SQG	Resource Conservation and Recovery Act, Small Quantity Generators
REC	recognized environmental condition
RGA	Recovered Government Archive
ROW	right-of-way
RSA	Regional Statistical Area
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
sf	square feet
SGVCOG	San Gabriel Valley Council of Government
SJCWRP	San Jose Creek Water Reclamation Plan
SLF	Sacred Lands File
SO ₂	sulfur dioxide
SoCalGas	Southern California Gas Company
SO _x	sulfur oxides
SRA	Source-Receptor Area
SVP	Society of Vertebrate Paleontology
SWEEPS	Statewide Environmental Evaluation and Planning
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TCSP	Town Center Specific Plan
TIS	Traffic Impact Study
TPH	total petroleum hydrocarbons
TWSC	two-way stop-controlled
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
v/c	Volume-to-Capacity
WDR	waste discharge requirement
VMT	vehicle miles traveled
VOC	volatile organic compound

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1 Introduction

The Hassen Development Project (Site A) (proposed project) would involve redevelopment of a 5.3-acre site in downtown Covina (project site) with a mixed-used development. The site is currently developed with vacant automotive uses and is located within the Town Center Specific Plan Area of the City of Covina. The proposed mixed-use development would have two components: a mixed-use building bounded by North Citrus Avenue and West San Bernardino Road with residential and commercial uses and a residential-only component bounded by West San Bernardino Road and North 3rd Avenue. The proposed project would involve partial abandonment of West Geneva Place, a two-way, City-owned roadway that currently divides the project site. Upon project implementation, the project site would have 161 townhomes; 13,500 square feet (sf) of retail space; 3,800 sf of restaurant space; 46,679 sf of outdoor area, and a multi-level parking garage.

1.1 California Environmental Quality Act Compliance

The City of Covina, as the lead agency for the proposed project, is responsible for preparing environmental documentation in accordance with the California Environmental Quality Act (CEQA) (Pub. Res. Code § 21000 et seq.: “CEQA”) to determine if approval of the discretionary actions requested and subsequent development on the proposed project site could have a significant impact on the environment.

As provided in Public Resources Code Section 21064.5, a Mitigated Negative Declaration (MND) may be prepared for a project that is subject to CEQA when an Initial Study (IS) has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

Based on the IS prepared for the proposed project, an MND has been prepared for the proposed project. The MND has been prepared in conformance with Section 15070(b) of the State CEQA Guidelines. The purpose of the MND and the IS (or, “IS/MND”) is to identify any potentially significant impacts associated with the proposed project and incorporate mitigation measures into the project to eliminate the potentially significant effects of the project or to reduce the effects to a level of insignificance.

1.2 Project Location

The approximately 5.3-acre project site is comprised of three parcels, located within the City of Covina (City), Los Angeles County (County), California: Assessor Parcel Numbers (APNs) 8431-015-042, APN 8431-014-015, and APN 8431-014-008. APN 8431-015-042 is located at 137 West San Bernardino Road and is bound by North 3rd Avenue to the west, North Citrus Avenue to the east, and a small dividing alley, West Geneva Place, to the north. The remaining two parcels, APNs 8431-014-015 and 8431-014-008, lie immediately north of West Geneva Place, at 141 West Geneva Place (see Figure 1-1). The project site is located in the center of the City, within the downtown area and within the Town Center Specific Plan (TCSP).

Regional access to the project site is provided by the Interstate (I) 10, located approximately one mile south of the project site and the I-210 freeway, located approximately two miles north of the project site. Immediate access to the project site is provided via West San Bernardino Road, West Geneva Place (via North Citrus Avenue), and North 3rd Avenue. (Hereafter, these streets will be referred to as San Bernardino Road, Geneva Place, Citrus Avenue, and 3rd Avenue.) The project site is located 500 feet southwest of the Covina Metrolink Station, which provides commuter rail service into downtown Los Angeles.

1.3 Environmental Setting

General Plan and Zoning Designations

The proposed project site is designated Town Center Commercial in the City's General Plan (City of Covina 2000). The project site is located in the TCSP area and is zoned Town Center Specific Plan-4, Mixed-Use Focused Activity Area (TCSP-4) (City of Covina 2015). See Figure 1-2, which shows the zoning designations for the project site and surrounding areas. The TCSP identifies the project site as an "especially well-suited [development] opportunity site due to large areas of common ownership, and proximity to both the downtown and the Metrolink commuter transit stop" (City of Covina 2004). The TCSP establishes a maximum building height of 50 feet for new development within the planning area that comprises at least 30% residential development (City of Covina 2004).

The TCSP-4 zone does not assume any particular predominant land use; rather, it provides the opportunity to develop and redevelop property within key development opportunity areas with a mix of land uses. The TCSP-4 zoning area is intended for retail, light industrial, cultural, entertainment, and residential uses, with an emphasis of mixing of uses on properties, within buildings, and within blocks, as compatibility allows. Single-use development projects are allowed subject to City review and approval. The TCSP-4 area provides the opportunity to mix residential uses on upper floors with retail, office, or other appropriate uses at the ground level or second level for multi-story development projects and provides the opportunity to mix commercial land uses of different types. The existing land uses at the project site are considered Automotive Industrial/Dealership in the TCSP (City of Covina 2004).

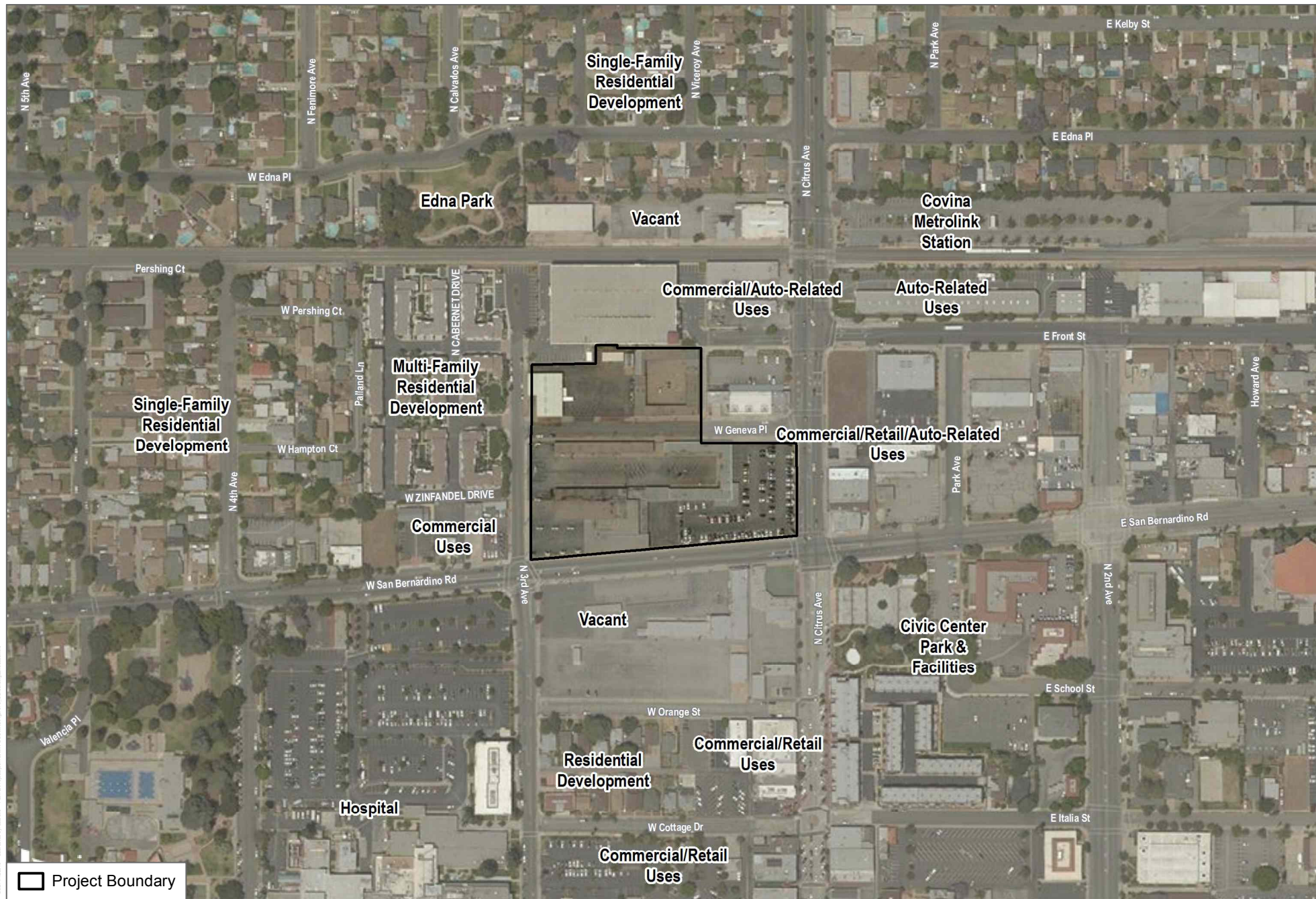
Existing Site Facilities

Under existing conditions, the project site is paved and comprises two segments (referred to as the northern and southern segments for the purpose of this document) which are separated by Geneva Place (see Figure 1-3). The northern segment is developed with an abandoned automobile paint and body shop and a vehicle/equipment storage yard. The abandoned automobile paint and body shop consists of a single-story concrete block building with an interior courtyard/service bay area. The vehicle/equipment storage yard consists of a single-story, metal shed and a yard that is used to store dilapidated construction equipment. Along the eastern edge of the northern segment (but still within the project site) is a narrow alleyway providing one-way vehicular access from Geneva Place to the uses north of the project site (namely, the City's Metrolink parking structure and an auto repair business).

The southern segment of the project site is developed with car dealership buildings and surface parking lots that are generally abandoned. In the western portion is a vacant parking lot, two single-story concrete block buildings with service bays and parking areas, and a single-story car showroom building. These uses appear generally abandoned, although some of the service bays and parking areas appear to be used for equipment storage and vehicle parking. A vacant used car dealership, which includes a single-story concrete block building and surface parking lot, is located in the eastern portion of the project site.

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SOURCE: County of Los Angeles; Bing Maps

FIGURE 1-3
Project Site and Surrounding Land Uses
Covina Hassen Development Project (Site A)

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The northern and southern segments of the project site are separated by Geneva Place, a two-way street that provides driveway access to both the northern and southern segments of the project site. Geneva Place is currently owned and maintained by the City. Along the southern sidewalk of Geneva Place is an aboveground 66 kilovolt (kV) transmission line supported by poles that are approximately 70 feet in height. There are four poles along the southern sidewalk of Geneva Place, extending from 3rd Avenue in the west to Citrus Avenue in the east. The 66 kV line is within a 25-foot-wide Southern California Edison easement. Along the northern Geneva Place sidewalk are seven utility poles with easements, that would remain in place.

Vegetation on the project site consists of several shrubs within a planter along the site's San Bernardino Road frontage and some foliage separating the northern segment of the site from the City's Metrolink parking structure.

Existing Site Access Points

Vehicular access to the project site is currently provided by three driveways. San Bernardino Road and 3rd Avenue provide access to the southern segment of the project site. Geneva Place, bisects the project site and connects 3rd Avenue to Citrus Avenue. Driveways off Geneva Place provide access to both the northern and southern segments of the project site. Pedestrian access is provided by existing public sidewalks, which extend along San Bernardino Road, 3rd Avenue, Citrus Avenue, and Geneva Place. Bicycle access is provided by the existing street network; however, no formal, designated on-street or off-street bicycle facilities are currently provided in proximity to the project site.

Existing Views Of and Through the Project Site

Photographs were taken from seven locations around the perimeter of the project site to show representative viewpoints of the existing conditions and surrounding land uses. Each photograph corresponds to one of the viewpoints listed below and shown in Figures 1-4(a) through 1-4(d).

Viewpoint A – Northwest View of the Project Site from across Citrus Avenue/San Bernardino Road Intersection: Viewpoint A is a view of the project site from the Citrus Avenue/San Bernardino Road intersection, looking northeast. The view shows the vacant used car dealership's primary concrete block building and a surface parking lot where for-sale vehicles were displayed at the time that the photograph was taken.

Viewpoint B – Northeast View of the Project Site from across San Bernardino Road: Viewpoint B is a view of the project site from across San Bernardino Road facing northeast. The viewpoint shows the existing vacant car showroom and a portion of the associated surface parking lot.

Viewpoint C – Southeast View of the Project Site from across Geneva Place/North 3rd Avenue Intersection: Viewpoint C is a view of the southern segment of the project site and the western entrance of Geneva Place from across 3rd Avenue. The viewpoint shows the existing paved surface lot, the concrete block buildings, and service bays within the southern segment of the project site and the western terminus of Geneva Place.

Viewpoint D – Southwest View of the Project Site and Geneva Place from across North Citrus Avenue: Viewpoint D is a view of the project site from across Citrus Avenue. The viewpoint shows the used car dealership's concrete block building and surface parking area, as well as a down-the-line view of Geneva Place, including the existing transmission lines on the south side of the street.

Viewpoint E - View of the Project Site and Geneva Place from North 3rd Avenue: Viewpoint E is a view of the northern segment of the project site from across 3rd Avenue. The viewpoint shows the western terminus of Geneva Place as well as a single-story metal building and a portion of the vehicle/equipment storage yard on the northern segment of the project site.

Viewpoint F – Southeast View of the Project Site from North 3rd Avenue: Viewpoint F is a view of the northern segment of the project site from 3rd Avenue. The viewpoint shows the existing single-story metal building in the northern segment and the vacant parking lot on the southern segment of the project site.

Viewpoint G – Northwest View of the Project Site from Geneva Place: Viewpoint G is a view of the northern segment of the project site, looking northwest from Geneva Place. The viewpoint shows the existing automobile paint and body shop, as well as a down-the-line view of Geneva Place.

Viewpoint H – Southwest View of the Project Site from Geneva Place: Viewpoint H is a view of the northeastern segment of the project site, looking southwest from Geneva Place. The viewpoint shows the vacant car dealership's concrete block building and surface parking area, as well as a down-the-line view of Geneva Place, including the existing transmission lines on the south side of the street.

Adjacent and Surrounding Land Uses

As shown in Figure 1-3, the project area is situated in an urban environment, within the vicinity of commercial and civic buildings, as well as residential neighborhoods. The City's Metrolink parking structure and an auto repair business lie immediately north of the project site and an appliance and mattress store (referred to herein as an "appliance store") is located immediately east of the northern project site segment and immediately north of the southern segment. Both the auto repair business and the appliance store have frontages on North Citrus Avenue. The vacant parcel south of the project site is currently undergoing construction of a mixed-use development consisting of 7,899 square feet of commercial space and 68 multi-family residential units. Additionally, at the northwest corner of West Orange Street and North Citrus Avenue, a separate mixed-use commercial and residential development is under construction. A car dealership and the Vintage Walk multi-family condominium development are located immediately west of the project site, across 3rd Avenue.

Land uses in the general vicinity of the project site include the Covina Police Department and the Covina Fire Department, located southeast of the project site; commercial and retail uses to the east, including an upholstery store, antique store, barber shop and automotive repair store; and, residential neighborhoods to the north and west of the project site. The closest public transit is the Covina Metrolink Station, located 500 feet northeast of the project site and across Citrus Avenue. There are five public parks within a one-mile radius of the project site: Cypress Park, Edna Park, Kelby Park, Covina Park, and Civic Center Park. There are eight schools within a one-mile radius of the project site: Cypress Elementary, Grace Lutheran Pre-School, Little Bunnies Montessori Daycare, Western Christian Private School, Sunkist Elementary, Covina High School, Barranca Elementary, and Covina Elementary School.

1.4 References

City of Covina. 2000. *Covina General Plan Land Use Element*. Accessed, April 10, 2019. https://covina.gov/sites/default/files/fileattachments/planning_commission/page/1073/land_use.pdf.

City of Covina. 2004. *Covina Town Center Specific Plan*. Accessed, April 4, 2019. https://covina.gov/sites/default/files/fileattachments/planning_commission/page/1074/towncenterspecificplanfinal.pdf.

City of Covina. 2015. *Zoning Map*. Accessed, April 10, 2019. https://covina.gov/sites/default/files/fileattachments/planning_commission/page/1071/zoning_map_2015_-_public_compressed.pdf.

2 Project Description

The proposed project would redevelop 5.3 acres of existing vacant automotive industrial/dealership uses with a mixed-use building and townhome development. The proposed development would consist of 161 townhomes; 13,500 gross sf of retail space; 3,800 gross sf of restaurant space; 46,679 gross sf of outdoor area, and a multi-level parking garage (see Figure 2-1 and Figure 2-2).

2.1 Project Objectives

The proposed project site lies 500 feet southwest of the Covina Metrolink Station and immediately south of the City's Metrolink parking structure. Being in close proximity to the Covina Metrolink Station creates opportunities for supporting Transit Oriented Development and multi-modal transit use, including pedestrian and bicycle connectivity. As such, the primary objectives of the proposed project include the following:

- To propose a mixed-use development that is in-line with the concept of a Transit Oriented Development, thereby maximizing access to public transport.
- Enhance pedestrian connections within the Town Center TCSP areas including along North Citrus Avenue, West San Bernardino Road, and North 3rd Avenue.
- Expand the availability of space for a variety of stores, restaurants, and entertainment venues in a pedestrian-oriented, village-like setting that will serve visitors and residents throughout the day and night, further activating the Town Center TCSP area.
- Redevelop and revitalize underutilized properties in a manner that maximizes development potential and exemplifies thoughtful urban in-fill design pursuant to the Covina TCSP.
- Provide new permanent jobs and temporary construction jobs through redevelopment of an urban in-fill site.
- Generate new tax revenues, helping to secure a strong and continuous tax base and maximize the direct and indirect fiscal and economic benefits for the City and regional area

2.2 Proposed Construction

The proposed project includes demolition and grading of the entire project site, followed by construction of the proposed uses. Project construction is anticipated to start in September 2020 and would last approximately 20 months, ending in April 2022. Construction activities for the proposed project would include demolition, site preparation, grading, building construction and trenching, paving, and architectural coating. The equipment fleet, number of workers, and expected duration for each of these activities is shown in detail in Table 3.3-2, Construction Scenario Assumptions, in Section 3.3, Air Quality.

A portion of the existing paved alley that separates the northern and southern segments of the project, Geneva Place, would be vacated by the City and developed as part of the project. The existing 70-foot transmission poles and associated 66 kV line along Geneva Place would be protected in place during construction.

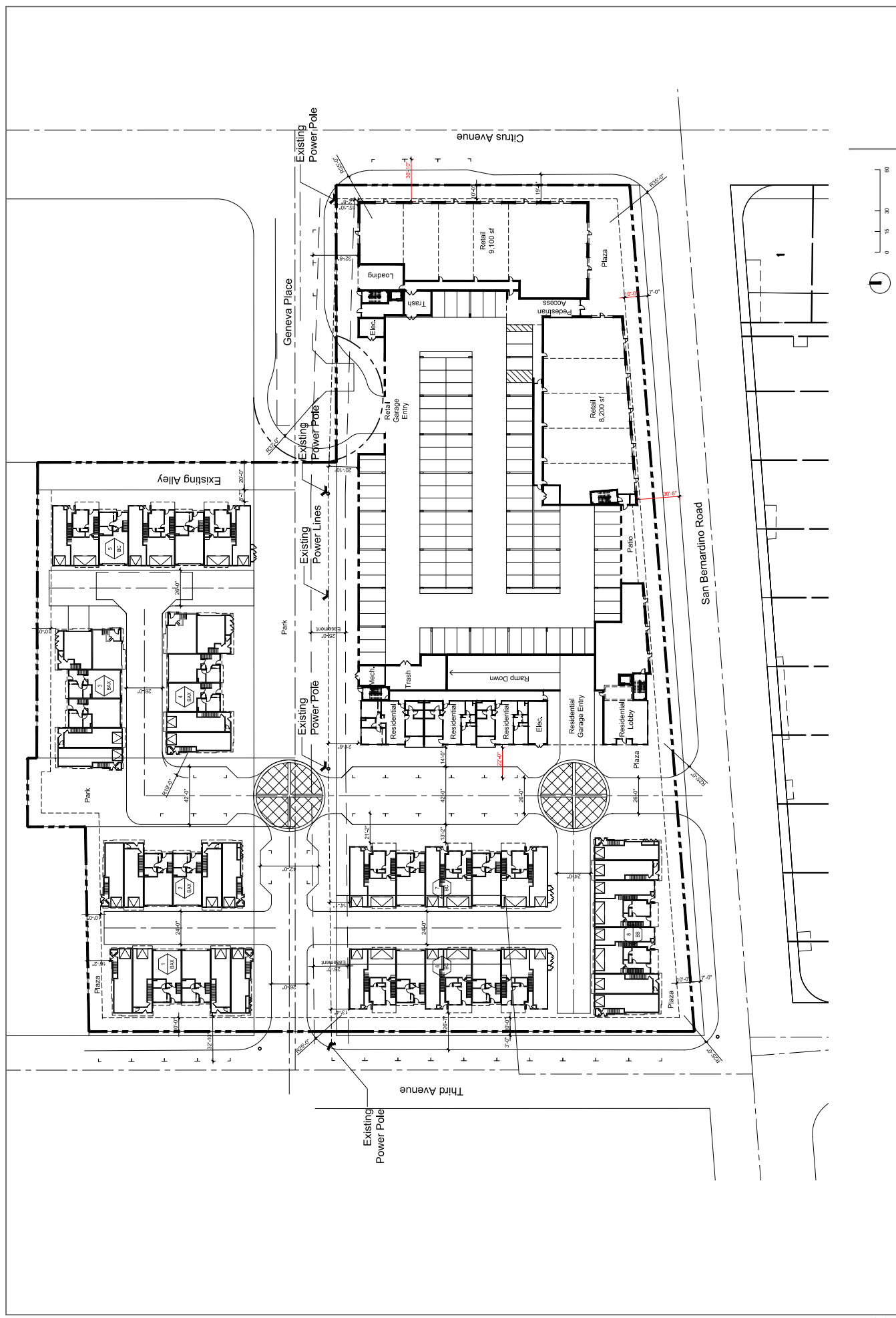
2.3 Project Design

The proposed development would consist of 161 townhomes (88 two-bedroom and 73 three-bedroom townhomes); 13,500 sf of retail space; 3,800 sf of restaurant space; and 46,679 sf of open space for use by residents and patrons of the proposed retail and restaurant space (see Figure 2-1 and Figure 2-2).

During project construction, a portion of Geneva Place would be demolished, joining the northern and southern segments of the project site. A mixed-use building with a multi-level parking garage; 13,500 sf of retail space; 3,800 sf of restaurant space; 35 townhomes; and 15,915 sf of open space courtyards would be constructed on the eastern portion of the project site, fronted by the remaining portion of Geneva Place to the north, Citrus Avenue to the east, and San Bernardino Road to the south (see Figure 2-3). The mixed-use building would be a maximum of 50 feet (four above-grade stories) in height. The multi-level parking structure would provide 409 spaces and would include one subterranean level for residential use, which would extend to a depth of 15 feet below grade, and one street level for use by retail/restaurant patrons. The parking garage would be accessible at street level via Geneva Place and San Bernardino Street. The Geneva Place entrance would be for the commercial uses and the entrance on San Bernardino Road would be for the residential uses. Architectural elements incorporated into the design of the mixed-use building would include metal awnings, light fixtures, and rafter tails. See Figure 2-3, which shows elevations for the mixed-use building. See Appendix A for additional design details.

The remainder of the project site would be developed with the remaining 126 townhomes, dispersed throughout eight structures. The eight townhome buildings would be interspersed with open space areas including a central courtyard, play area, and pedestrian plazas with recreational amenities such as barbeque pits, outdoor eating areas, seating areas, and a turf lawn area. Architectural elements incorporated into the design of the proposed townhome buildings would include brick veneer, stucco, metal awnings, metal railings, and light fixtures. The proposed townhomes would be a maximum of three stories and 36 in height. (See Figure 2-4, which shows representative elevations for the residential buildings.) For a full set of the residential building elevations, see Appendix A.

As stated above, Geneva Place would be demolished where it bisects the project site, combining the northern and southern segments of the project site and providing space for a central community courtyard for the proposed residential uses. The segment of Geneva Place not included in the project site would be left as-is and would be terminated in a small cul-de-sac that would be accessed via Citrus Avenue. The remaining portion of Geneva Place would provide access to the multi-level parking garage for the proposed commercial uses and would continue to provide access to the loading/delivery area for the appliance store to the northeast of the project site, which currently has access along Geneva Place. The small alley that runs parallel to the existing automobile paint and body shop would be demolished and converted into a landscaped area.



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SOURCE: MJS Landscape Architecture, 2017

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FIGURE 2-2

Landscaping Plan

Covina Hassen Development Project (Site A)

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1. South Elevation at San Bernardino Road



2. West Elevation

4. East Elevation at Citrus Avenue



3. North Elevation at Geneva Place

SOURCE: MJS Landscape Architecture, 2017

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2. Left Elevation



1. Front Elevation



4. Right Elevation



3. Rear Elevation

SOURCE: MJS Landscape Architecture, 2017

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FIGURE 2-4
Conceptual Elevations - Residential Building
Covina Hassen Development Project (Site A)

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Proposed Vehicular Access and Parking

Vehicular access to the project site would be provided via driveways along San Bernardino Road, 3rd Avenue, and the remaining portion of Geneva Place. The parking garage would include a subterranean level, accessed via San Bernardino Road, for residential use and a street level, accessed via the remaining portion of Geneva Place, for commercial patrons' use. An additional 15 on-site surface parking spaces, 19 street parking spaces, and two driveway spaces would be provided as part of the proposed project.

Proposed Pedestrian Access

The proposed project has been designed to encourage pedestrian activity. The overall project site would provide a combination of landscape and hardscape improvements that facilitate internal accessibility and encourage active transportation. Such improvements reflect the circulation objectives stated in the Covina TCSP. The project site is accessible from surrounding land uses and nearby public transportation (Metrolink) as well as via public sidewalks on Citrus Avenue, 3rd Avenue, and San Bernardino Road. Additionally, the proposed project includes pedestrian access points, pedestrian plazas along San Bernardino Road and 3rd Avenue, and pedestrian amenities within the site such as landscaped walkways, benches, a turf/lawn area, and courtyards. See Figure 2-2.

Proposed Bicycle Access

Bicycle access to the project site will be provided by the existing street network. The City of Covina Bicycle Master Plan proposes a number of bicycle facilities near, or immediately adjacent to, the overall project site (City of Covina 2011). The proposed facilities within an approximate one-quarter mile radius include:

Fourth Avenue: Class III Bike Route from San Bernardino Road to Puente Street

Citrus Avenue: Class II Bike Lane north of Front Street and south of Badillo Street

Second Avenue: Class II Bike Lane from Front Street to Rowland Avenue

Edna Place: Bicycle Boulevard from Azusa Avenue to First Avenue

Front Street: Class II Bike Lane from Citrus Avenue to Second Avenue

San Bernardino Road: Class II Bike Lane west of Hollenbeck Avenue and east of Second Avenue, Class III Bike Route from Hollenbeck Avenue to Second Avenue

Badillo Street: Class II Bike Lane from Lark Ellen Avenue to Cypress Street

The project is well located to further facilitate and encourage bicycling as a mode of transportation as these facilities are constructed.

2.4 Required Permits and Approvals

A list of permits and approvals from the City that are required to complete the proposed project include, but are not necessarily limited to the following:

- Tentative Tract Map Review
- Site Plan Review
- Building Permits, Grading Permits, Encroachment Permits etc.

- Final Map Review and Street Improvement Plan Review
- Street Vacation of Geneva Place
- Street Vacation of the alley located east of the project site
- Purchase Agreement to acquire a portion of Geneva Place and the alley located east of the project site

Approvals from other agencies may also be required and are listed as follows:

- State Water Resources Control Board, Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit, Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002
- Los Angeles County Fire Department – Plan Approval
- Utility Providers – Utility Connection Permits
- Coordination/approvals from Southern California Edison for construction within a transmission easement

2.6 References

City of Covina. 2011. *City of Covina Bicycle Master Plan*. Accessed, April 5, 2019. https://covina.ca.gov/sites/default/files/fileattachments/community_development/page/1253/covina_bicycle_master_plan_approved_092011.pdf.

3 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the State CEQA Guidelines (2019) to determine if the proposed project may have a significant effect on the environment.

1. Project title:

Hassen Development Project (Site A)

2. Lead agency name and address:

City of Covina
125 East College Street
Covina, California 91723

3. Contact person and phone number:

Brian K. Lee, AICP, Director of Community Development
626.384.5458

4. Project location:

137 West San Bernardino Road and 141 Geneva Place, Covina, California 91723

5. Project sponsor's name and address:

Hassen Development Corporation/Bentley Real Estate, LLC
1932 E. Garvey Avenue South
West Covina, California 91791

6. General plan designation:

Town Center Commercial

7. Zoning:

Town Center Specific Plan-4

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

Refer to Chapter 2 of this Initial Study

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

Refer to Section 1.3 of this Initial Study

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Refer to Section 2.4 of this Initial Study

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, see Section 3.18 for details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected


The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Signature

11.14.19
Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project have a substantial adverse effect on a scenic vista?*

Less Than Significant Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Scenic vistas generally refer to views that are accessible from public vantage points, such as public roadways and parks.

There are no officially designated scenic vistas in the City (City of Covina 2000). However, views of the San Gabriel Mountains and the Covina Hills are available from a variety of locations throughout the City. Due to the low topography of the Covina Hills, views of that resource are primarily observed from roadways that lead up to the hills or from the southbound travel lane of major north-south roadways in the City. Due to the size and height of the San Gabriel Mountains, views of this resource are more prominent throughout the City. However, many views of the Covina Hills and San Gabriel Mountains have been compromised either partially or entirely by existing development, landscaping, and urban infrastructure. Complete views of the San Gabriel Mountains and the Covina Hills are generally limited to the City's north-south roadway corridors. Potential effects of the proposed project on public views of the San Gabriel Mountains and Covina Hills are characterized in the subsection below.

- **3rd Avenue:** 3rd Avenue is a two-lane, north-south trending roadway that borders the western perimeter of the project site. Although existent, views of the San Gabriel Mountains to the north are limited, and generally obstructed by streetscaping, including development and landscaping, and by existing topography. Similarly, views of the Covina Hills to the south, although more prevalent, are inhibited by streetscaping, including vegetation and streetlight/utility poles. The proposed project includes demolishing existing vacant, single-story structures and redeveloping the project site with a mixed-use building, which would be a maximum of 50 feet in height, and townhomes buildings, which would be a maximum of 36 feet in height. The existing views of the San Gabriel Mountains and the Covina Hills are only visible from the 3rd Avenue right-of-way (ROW), which would not be altered by the proposed project. Given this, existing views of the San Gabriel Mountains to the north and the Covina Hills to the south would not be adversely affected by the project.
- **Citrus Avenue:** Citrus Avenue is a two-way, four-lane roadway that runs north-south through the City. Under existing conditions, views of the San Gabriel Mountains to the north are prevalent. However, views are compromised by existing streetscaping, including streetlights and transmission lines within the Citrus Avenue ROW. Under existing conditions, the ridgeline and lower topography of the San Gabriel Mountains can be seen rising above the existing single-story structures on the project site. The proposed project includes demolishing the existing single-story structures and redeveloping the project site with a mixed-use building and townhomes ranging from 36 feet to 50 feet in height. The increased height and massing associated with the proposed development would further obstruct the existing views of the San Gabriel Mountains from Citrus Avenue. However, the project would not affect the more complete view of the San Gabriel Mountains that is observed when looking directly north along the Citrus Avenue corridor. Rather, the project, due to its height and massing, would further compromise the fleeting view to the northwest that is already partially obstructed by existing urban development. However, because portions of this view are already obscured and because the proposed project would result only in a fleeting obstruction, significant effects to views of the San Gabriel Mountains would not occur.

Views of the Covina Hills to the south are existent from the Citrus Avenue ROW; however, they are mostly obstructed by large street trees and several multi-level buildings at the intersection of Citrus Avenue and Cottage Street. Views of the Covina Hills are not available from the project site or over the existing buildings on the project site. Views are limited to the Citrus Avenue ROW. The proposed project would not encroach into the Citrus Avenue ROW and thus would not adversely impact existing views of the Covina Hills to the south.

- **San Bernardino Road:** Under existing conditions, the ridgeline and lower topography of the San Gabriel Mountains can be seen from San Bernardino Road, rising above the existing vacant and single-story structures on the proposed project site. The proposed project includes demolishing the existing single-story structures and redeveloping the project site with a mixed-use building and townhomes. The mixed-use building would front San Bernardino Road and would be a maximum of 50 feet in height. The townhomes would front San Bernardino Road and 3rd Avenue and would be a maximum of 36 feet in height. The increased height and massing associated with the proposed development has the potential to further obstruct the existing views of the San Gabriel Mountains from San Bernardino Road. However, because portions of this view are already compromised by urban development and streetscaping, significant effects to views of the San Gabriel Mountains would not occur.

Views of the Covina Hills to the south are obscured by the single-story buildings located across San Bernardino Road south of the project site. The proposed project is located north of San Bernardino Road and, therefore, would not impact any south-facing views of the Covina Hills that may be available.

In summary, views of both the San Gabriel Mountains and the Covina Hills are available from one or more of the roadways surrounding the project site. However, these existing views are limited due to obstructions typical of urban development, such as utility poles, landscaping, and buildings. The proposed project would introduce new development to the project site, which would range between 36 feet and 50 feet in height and would have the potential to further obstruct views of the San Gabriel Mountains that are partially visible through and above the existing single-story structures on the project site. However, as described above, views of the San Gabriel Mountains from surrounding roadways are already limited by existing development. Partial obstructions of these views are prevalent throughout the City and the region and are part of the existing condition of the visual environment. As such, the introduction of several new structures along Citrus Avenue, San Bernardino Avenue, and 3rd Avenue would not substantially degrade or obstruct an existing scenic vista of the San Gabriel Mountains.

Regarding the Covina Hills, views are primarily observable from the north-south corridors in the City, including Citrus Avenue and 3rd Avenue. Due to the low-lying nature of these hills and the intervening urban development, views are not readily observable from or through the proposed project site. As such, developing 36-foot to 50-foot structures on the proposed project site would not have the potential to substantially degrade or obstruct an existing scenic vista of the Covina Hills. For the reasons described above, the effects of the proposed project on scenic vistas would be **less than significant**. No mitigation is required.

b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. State Highway 2, located approximately 20 miles northwest of the project site, is the nearest officially designated state scenic highway (Caltrans 2011). There is an eligible but not officially designated state scenic highway located approximately one mile west of the project site (State Highway 39, which is also called Azusa Avenue). The proposed project would be constructed within an urban area and would not be visible from State Highway 2 or State Highway 39 due to intervening urban development, distance, and topography. Therefore, implementation of the proposed project would not substantially damage scenic resources within a state scenic highway, and **no impact** would occur.

c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less Than Significant Impact. The proposed project site is located in an urban area, surrounded by existing commercial structures, public facilities, and residential development (see Figures 1-1, 1-2 and 1-3 for details). The proposed project would redevelop existing vacant lots in the City's downtown area. The placement of a new mixed-use structure and townhomes would alter the appearance of the project site but would not represent a substantial degradation of the visual character or quality of the project site. Under existing conditions, the project site is paved and developed with single-story structures. The project site does not provide usable or scenic open space, nor does it provide high-quality or historic architectural elements. Landscaping on the site is limited. (See Figure 1-4, which

shows the exiting conditions on the site.) Surrounding land uses include commercial and retail to the east across Citrus Avenue, an existing vacant car dealership to the south across San Bernardino Road, and single and multi-family residential development to the west and north. Surrounding land uses vary in height, but are generally between one and three stories. Given that the project would redevelop an underutilized site and construct new mixed-use and residential development ranging between 36 feet and 50 feet in height (or, three above-grade stories to four above-grade stories), the proposed project would be generally consistent with surrounding land uses and with the TCSP-4 zone height regulations, which establish a maximum height of 50 feet (City of Covina 2004). Furthermore, proposed project design would add architectural and landscape features that would improve the visual quality of the project site and the project area as a whole compared to existing conditions.

The proposed project would be consistent with the guidelines developed for the TCSP-4 zone, which aims to achieve “higher residential and commercial densities, including buildings of two to four stories in appropriate locations, on properties with infill and reuse potential” (City of Covina 2004). The proposed project is located on parcels with reuse potential, since the project site is currently underutilized and generally vacant. Furthermore, as explained above, the proposed building heights would not substantially compromise views or conflict with development in the vicinity. For these reasons, the proposed project would not substantially degrade the existing visual character or quality of the project site or its surroundings, and impacts would be **less than significant**. No mitigation is required.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. The existing used car dealership on the project site contains extensive exterior floodlighting which has historically been used to display the on-site cars for sale during nighttime hours. Additionally, there is street lighting along Citrus Avenue and fronting the Vintage Walk condominium development on 3rd Avenue.

The proposed project would incorporate several sources of new nighttime lighting, consisting primarily of business identification signs, storefront windows, pedestrian walkway lighting, and new light posts. The new light posts would be located along the on-site pedestrian walkways and common areas, as well as within the public sidewalks along Geneva Place, Citrus Avenue, San Bernardino Road, and 3rd Avenue. On-site lighting would be warm colored and unobtrusive. Exterior lighting fixtures on the site would consist of 42-inch-high bollards, 10-foot poles, theme pole light, overhead festival lights, and recessed louvers. Lighting would be designed to avoid casting light or glare on surrounding land uses. Light sources would be directed so that lighting would not fall outside the area to be lit. In addition to the on-site outdoor lighting, new streetlights would be installed along Citrus Avenue, 3rd Avenue, and the remaining portion of Geneva Place. Street lights would be compliant with the City’s lighting and design standards. Additionally, the light posts would be installed consistent with the TCSP, which calls for the extension of streetscape improvements northward to the Covina Metrolink Station (City of Covina 2004).



ABOVE: Viewpoint A - Northwest View of the Project Site from across Citrus Avenue-San Bernardino Road Intersection
 BELOW: Viewpoint B - Northeast View of the Project Site from across San Bernardino Road



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ABOVE: Viewpoint C - Southeast View of the Project Site from across Geneva Place-North 3rd Avenue Intersection
 BELOW: Viewpoint D - Southwest View of the Project Site and Geneva Place from across North Citrus Avenue



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ABOVE: Viewpoint E - View of the Project Site and Geneva Place from North 3rd Avenue.
 BELOW: Viewpoint F - Southeast View of the Project Site from North 3rd Avenue



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ABOVE: Viewpoint G - Northwest View of the Project Site from Geneva Place
 BELOW: Viewpoint H - Southwest View of the Project Site from Geneva Place



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Lighting is of most concern when it may potentially spill over or trespass from a project site onto properties or areas, particularly residential properties, and the public sidewalk or right-of-way. However, the new sources of light on the project site would not adversely affect nighttime views relative to existing conditions, as substantiated below.

The proposed project is located in the City's downtown area and, as such, there are numerous sources of nighttime lighting and nighttime glare, such as streetlights, lit store windows, and business identification signs. The types of lighting that would be implemented as part of the proposed project (i.e., streetlights, landscape lighting, pathway lights, courtyard lighting, business identification signs, and lit windows) would be consistent with the surrounding nighttime lighting environment and would not introduce a substantial new source of light that would have the potential to adversely affect nighttime views in the area. Furthermore, the majority of the surrounding development consists of commercial and public service uses, which are not considered light-sensitive or glare-sensitive uses. The exception is the Vintage Walk condominium development across 3rd Avenue. Lighting that is installed as part of the project would utilize materials and design features to minimize light and glare effects at surrounding land uses. For example, lights would use tungsten or metal halide bulbs, which produce warm colored, unobtrusive light, and lighting sources along the paved and landscaped areas would be concealed and, as such, would cast indirect (unobtrusive) light. Additionally, all lighting installed as part of the project would be required to comply with state and local standards established to protect light-sensitive receptors. For example, Section 5.106.8 (Light Pollution Reduction) of the 2016 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11 (or, CALGreen)) sets forth requirements for all non-residential outdoor lighting, which include standards for backlight, uplight, and glare. The commercial portion of the project would be subject to these standards. The City also has its own regulations that limit the amount of light spillover onto residential uses. Municipal Code Section 9.42.020 (applicable to disturbances imposed on residential uses only) requires that "no operation, activity, sign, or lighting fixture shall create illumination that exceeds five foot-candles¹ on any adjacent property, whether the illumination is direct or indirect light from the source. Glare levels shall be measured with a photoelectric photometer following the standard spectral luminous efficiency curve adopted by the International Commission on Illumination." As such, required compliance with Municipal Code Section 9.42.020 would ensure that adverse nighttime lighting and glare effects do not occur at nearby residential uses as a result of project implementation.

Glare can also be produced during the daytime and is usually associated with reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels. As described in Section 2.3 of this IS/MND, building materials for the proposed townhomes would generally consist of stucco, metal railings, awnings, and flat concrete roof tile, none of which would introduce large amounts of reflective glare on site or in the surrounding area. The project would include solar panels on the rooftop of the mixed-use building (see Section 3.3, Air Quality for details). Although these solar panels would be made from materials that are typically reflective and, as such, could produce glare, any solar panels associated with the proposed project would be placed on the rooftop and, thus, would be obscured from motorists, pedestrians and much of the adjacent development, due to the height of the mixed-use building and the flat terrain of surrounding development. The mixed-use building would also include glass storefront windows in the commercial (retail/restaurant) spaces; however, these windows would front other commercial land uses on Citrus Avenue and San Bernardino Road and would not result in significant new glare when compared to existing

¹ Municipal Code Section 9.42.020 defines a foot-candle as the illumination produced by a light of one international candle upon a surface one foot away.

on-site light and glare and light and glare produced by surrounding land uses. Due to the location of the project within an existing urbanized area, the proposed project design, and the project's required compliance with state and local regulations for light and glare, impacts would be **less than significant**. No mitigation is required.

References

City of Covina. 2000. City of Covina General Plan. Adopted April 2000. Accessed April 11, 2019. <http://www.covinaca.gov/city-departments/community-development/planning>.

City of Covina. 2004. Covina Town Center Specific Plan. Final. Prepared by Cotton/Bridges/Associates. November 2004. Accessed April 11, 2019. https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1074/towncenterspecificplanfinal.pdf.

Caltrans (California Department of Transportation). 2011. Caltrans Officially Designated Scenic Highways. Last updated September 7, 2011. Accessed April 11, 2019. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

No Impact. The project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP 2016). Therefore, the project would not convert Farmland to non-agricultural uses, and **no impact** would occur.

- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. The project site is zoned Town Center Specific Plan-4. Agricultural uses are not permitted or planned for the TCSP Area (City of Covina 2004). According to the California Department of Conservation Williamson Act map, the project site is not under a Williamson Act contract (DOC 2016). As such, the project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and **no impact** would occur.

- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

No Impact. As described in Section 3.2(b), the project site is zoned TCSP-4 and is within an area designated for mixed-use developments, such as retail, light industrial, cultural and entertainment venues, and residential uses. As such, the project site is not within areas zoned for forest land, timberland, or Timberland Production. The project site is within an urban area, and there are no areas zoned for agricultural or forest land uses within the vicinity of the project site. Therefore, the project would not conflict with existing zoning, or cause the rezoning of forest land, timberland, or Timberland Production land, and **no impact** would occur.

- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

No Impact. The project site is located within a built, urbanized area and no forest lands exist within the project vicinity. As such, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use, since forest land is not present on the site. **No impact** would occur.

- e) **Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. No agricultural resources or operations currently exist on or near the project site. Therefore, the proposed project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. **No impact** would occur.

References

- DOC (California Department of Conservation). 2016. Los Angeles County Williamson Act FY 2015/2016. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed April 25, 2019. https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx.
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3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

Less Than Significant Impact. The proposed project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a proposed project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

Consistency Criterion No. 1: Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

Consistency Criterion No. 2: Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the proposed project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix B. As presented in Section 3.3(b), construction and operation of the proposed project would not generate criteria air pollutant emissions that exceed the SCAQMD's thresholds, and it would therefore be consistent with Criterion No. 1.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).² The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

² Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

As discussed in Section 1.3 of this IS/MND, the General Plan land use designation for the proposed project site is Town Center Commercial, and the zoning designation is TCSP-4. The proposed uses for the project site are consistent with the existing land use designations, and no changes in land use designations would be required.

The project site is well-located to encourage the use of public transit and active transportation modes. The proposed project site is 500 feet southwest of the Covina Metrolink Station (located at 600 North Citrus Avenue), which provides commuter rail service into Downtown Los Angeles, and local public transit is provided along Citrus Avenue. The site is in close proximity to retail shops, restaurants, and other businesses along Citrus Avenue and San Bernardino Road, permitting easy pedestrian and bicycle trips along these corridors. Therefore, the proposed project's relative proximity to the Covina Metrolink Station would provide housing near existing infrastructure and could result in a reduction of miles traveled and associated air emissions from the resident's trips to work and other activities. Accordingly, the proposed project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the proposed project's potential to conflict with or obstruct implementation of the applicable AQMP would be **less than significant**. No mitigation is required.

- b) ***Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

Less Than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O₃, as well as CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}.

Regarding NAAQS and CAAQS attainment status,³ the SCAB is designated as a nonattainment area for national and California O₃ and PM_{2.5} standards (CARB 2018; EPA 2018). The SCAB is designated as a nonattainment area for California PM₁₀ standards; however, it is designated as an attainment area for

³ An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the Environmental Protection Agency (EPA) and California Air Resources Board (CARB), respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

national PM₁₀ standards. The SCAB nonattainment status of O₃, PM₁₀, and PM_{2.5} standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and California NO₂, CO, and SO₂ standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.⁴

Appendix G of the CEQA Guidelines states that significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2015). The quantitative air quality analysis provided in this section (Section 3.3) applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA, as presented in Table 3.3-1.

Table 3.3-1. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
VOC	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Lead ^a	3	3
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs ^b (including carcinogens and noncarcinogens)	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and Acute Hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2015.

SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; TAC = toxic air contaminant; NO₂ = nitrogen dioxide; ppm = parts per million; µg/m³ = micrograms per cubic meter.

a The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

b TACs include carcinogens and non-carcinogens.

A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O₃, which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for

⁴ Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project's emissions of O₃ precursors (VOCs and NO_x) on O₃ levels in ambient air cannot be determined through air quality models or other quantitative methods.

The following discussion quantitatively evaluates project-generated emissions and impacts that would result from implementation of the proposed project.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions. Therefore, an increment of day-to-day variability exists.

Emissions from the construction phase of the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. For emission estimation purposes, construction is assumed to begin in August of 2019 and conclude in April of 2021. A detailed depiction of expected construction schedules—including information regarding phasing, equipment used during each phase, trucks, and worker vehicles—is provided in Appendix B. The analysis assumes a construction start date of August 2019, which represents the earliest date construction would initiate. In the event construction is started later than August 2019, the analysis performed represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

The construction equipment mix used for estimating the construction emissions of the proposed project is based on information provided by the applicant and is shown in Table 3.3-2. For this analysis, it was assumed that heavy construction equipment would operate 5 days a week during project construction.

Table 3.3-2. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment			Schedule	
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Types	Quantity	Usage Hours	Start Date	Finish Date
Demolition	20	-	334	Rubber Tired Dozers	1	8	8/1/2019	10/1/2019
				Tractors/Loaders/Backhoes	2	8		
Site Prep and Grading	24	-	616	Graders	1	8	11/1/2019	1/1/2020
				Excavators	1	8		
				Rubber Tired Dozers	2	8		
				Tractors/Loaders/Backhoes	3	8		
Building Construction - Trenching	12	-	-	Trencher	2	8	1/1/2020	6/1/2020
				Tractors/loaders/backhoes	3	8		
Building Construction	50	20	-	Air Compressors	2	8	1/1/2020	4/1/2021
				Cranes	2	8		
				Forklifts	1	8		
				Generator Sets	2	8		
				Tractors/Loaders/Backhoes	2	8		
				Welders	3	8		
Paving	16	12	-	Surfacing Equipment	1	8	6/1/2020	7/31/2020
				Pavers	1	8		
				Paving Equipment	1	8		
				Rollers	1	8		
Architectural Coating	16	4	-	Air Compressors	2	8	8/3/2020	4/1/2021
				Aerial Lift	1	8		

Notes: See Appendix B for details. 2 one-way trips will be assumed per worker, per haul truck, and per vendor truck.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5} emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. It is anticipated that no fill material would be imported and 8,700 cubic yards of material would be exported during construction. The proposed project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas up to three times per day, depending on weather conditions. The application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure asphalt from a supplier in compliance with the requirements of SCAQMD's Rules 1108 (Cutback Asphalt) and/or 1108.1 (Emulsified Asphalt). The proposed project would involve application of architectural coating (e.g., paint and other finishes) for painting of the proposed buildings. The contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 3.3-3.

Table 3.3-3. Estimated Maximum Daily Construction Emissions

	VOC	NO _x	CO	SO _x	PM ₁₀ ^a	PM _{2.5} ^a
Year	<i>pounds per day</i>					
2019	3.98	44.87	22.65	0.05	7.28	4.57
2020	12.11	94.37	64.00	0.13	18.53	9.10
2021	11.61	36.81	36.24	0.07	2.67	1.97
Maximum Daily Emissions	12.11	94.37	64.00	0.13	18.53	9.10
SCAQMD Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix B for detailed results.

a These estimates reflect control of fugitive dust required by SCAQMD Rule 403 (SCAQMD 2005).

As shown in Table 3.3-3, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during project construction. Therefore, construction impacts of the proposed project would be less than significant, and no mitigation measures are required.

Operational Emissions

Operation of the proposed project would produce VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), energy sources (natural gas, appliances, and space and water heating), and stationary sources (emergency generator). CalEEMod was used to estimate daily emissions from these operational sources including modelling the emissions of a 300 kilowatt (kW) diesel-fired emergency generator based on 1 hour per day and 50 hours per year of operation per SCAQMD Rule 1470, which limits emergency generators to 50 hours of use per year for maintenance and testing. CalEEMod default emission factors were used for the proposed generator, corresponding with the install dates.

On-road vehicular emissions associated with the proposed project were modeled using CalEEMod default trip generation rates for retail, residential, and restaurant land uses. Emissions from energy sources include electricity and natural gas combustion for appliances and space and water heating. CalEEMod defaults were also used for area sources (landscape maintenance equipment, consumer products, and architectural coatings for maintenance of buildings).

The applicant proposes to install rooftop solar with a preliminarily estimated nameplate capacity of 240 kW-Direct Current (DC) resulting and an estimated 420 megawatt hour (MWh)-Alternating Current (AC) output. The solar energy output was accounted for in CalEEMod as on-site renewable energy.

Table 3.3-4 summarizes the average daily area, energy, mobile, and stationary source emissions of criteria pollutants that would be generated by the development of the proposed project and how project-generated emissions compare to the SCAQMD thresholds of significance. The values shown are the maximum summer or winter daily emissions (i.e., foreseeable worst case) results from CalEEMod. Details of the emission calculations are provided in Appendix B.

Table 3.3-4. Estimated Maximum Daily Operational Emissions

	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Emission Source	(pounds per day)					
Area	4.35	0.15	13.36	0.001	0.074	0.074
Energy	0.11	0.94	0.50	0.01	0.075	0.075
Mobile	3.60	16.15	40.96	0.13	10.49	2.88
Stationary	4.43	0.34	11.53	0.002	0.02	0.02
Total	12.48	17.59	66.35	0.14	10.66	3.05
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Area sources = consumer product use, architectural coatings, and landscape maintenance equipment. Energy sources = natural gas. Mobile sources = motor vehicles.

See Appendix B for detailed results. The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 3.3-4, the increase in emissions associated with the operation of the proposed project would not exceed the SCAQMD thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O₃ and PM_{2.5}, and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. Construction and operational activities of the proposed project would generate VOC and NO_x emissions (precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Tables 3.3-3 and 3.3-4, project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM₁₀, or PM_{2.5}, and therefore the proposed project would not cause a cumulatively significant impact.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.⁵ However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would also be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ and PM_{2.5} emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD.

Therefore, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be **less than significant** during construction and operation. No mitigation is required

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Localized project impacts associated with construction criteria air pollutants emissions are assessed below and were determined to be less than significant.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). Sensitive receptors near the proposed project site include the following:

Multi-family residential land uses located to the west of the proposed project site.

Planned multi-family and existing single-family residential land uses located to the south and east of the project site.

Civic Center Park, located to the southeast of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of a project site as a result of construction activities. The impacts of the proposed project were analyzed using methods consistent with those in the SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2009). SCAQMD's *Final Localized Significance Threshold Methodology* provides thresholds based on a project site's location, size, and distance to the closest sensitive receptor. The proposed project is located in Source-Receptor Area (SRA) 9 (East San Gabriel Valley), and the project site is 5.3 acres in size. However, active construction would not likely occur on the entire 5.3-acre site at any one time. For sites greater than 5 acres, SCAQMD recommends selecting LST thresholds based on the expected area of active construction, to provide a more representative analysis of the anticipated effects. CalEEMod is used to calculate the expected area of active construction for the project, based on the type of construction and the equipment fleet that would be used (SCAQMD 2011).

⁵ The State CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

Per SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2009), the LSTs are only applicable to NO_x, CO, PM₁₀, and PM_{2.5}, as these are the localized pollutants of concern. The greatest on-site emissions of NO_x, CO, PM₁₀, and PM_{2.5} generated during construction would occur during grading. Consistent with SCAQMD guidance (SCAQMD 2011), LST thresholds are developed based on the number crawler tractors, graders, rubber tired dozers and scrapers that are being used. As shown in Table 3.3-2, it was assumed that one grader, two rubber tired dozers, and three tractors/loaders/backhoes would be utilized during grading. Of the three tractors/loaders/backhoes, it is conservatively assumed that one crawler tractor is included and the remaining two units would be loaders and backhoes. This assumption is conservative and results in the lowest LST threshold. CalEEMod default values assume that during an 8-hour day, graders, rubber tired dozers, and crawler tractors can each disturb a maximum of 0.5 acres. This results in two acres disturbed per day based on one grader, two rubber tired dozers and one crawler tractor. The SCAQMD LST values for two acres within SRA 9 with a receptor distance of 25 meters (the shortest distance provided by the SCAQMD) were compared to emissions from the proposed project. The closest sensitive receptors are multi-family residential land uses located approximately 50 feet west of the western project site perimeter. The shortest receptor distance available in the SCAQMD LST Methodology and what is assumed for this analysis is 25 meters (82 feet).

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. Off-site emissions from trucks and worker vehicle trips are not included in the LST analysis because they occur off site. The maximum daily on-site construction emissions generated during construction of the proposed project are presented in Table 3.3-5 and are compared to the SCAQMD localized significance criteria for SRA 9 to determine whether project-generated on-site construction emissions would result in potential LST impacts.

Table 3.3-5. Construction Localized Significance Thresholds Analysis

	NO ₂	CO	PM ₁₀	PM _{2.5}
Year	<i>pounds per day (on site)</i>			
2019	40.42	20.58	6.74	4.42
2020	37.72	27.57	6.59	4.27
2021	29.6	27.03	1.51	1.45
Maximum Daily On Site Emissions	40.42	27.57	6.74	4.42
<i>SCAQMD LST Criteria</i>	<i>128</i>	<i>953</i>	<i>7</i>	<i>5</i>
Threshold Exceeded?	No	No	No	No

Source: SCAQMD 2009.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix B for detailed results.

Localized significance thresholds are shown for a 2-acre project site and a distance of 25 meters (82 feet) to the nearest sensitive receptor.

As shown in Table 3.3-5, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized project construction impacts would be less than significant. No mitigation is required.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme

meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

The Code of Federal Regulations (CFR) Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (hot-spot analysis), states that “CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123(c)(5)). While project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities are considered temporary. As a result, the proposed construction activities would not require a project-level construction hotspot analysis.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the proposed project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The traffic impact study for the proposed project, which is included in this IS/MND as Appendix H, evaluated whether there would be a decrease in the LOS (i.e., increased congestion) at the intersections affected by the proposed project. The potential for CO hotspots was evaluated based on the results of the traffic impact study. The California Department of Transportation Institute of Transportation Studies Transportation Project-Level Carbon Monoxide Protocol (CO Protocol; Caltrans 2010) was followed for this analysis. CO hotspots are typically evaluated when (1) the level of service (LOS) of an intersection decreases to LOS E or worse; (2) signalization and/or channelization is added to an intersection; and (3) sensitive receptors such as residences, schools, and hospitals are located in the vicinity of the affected intersection or roadway segment.

The proposed project’s traffic impact study evaluated 11 intersections under AM and PM peak hours. As determined by the traffic impact study, LOS at these intersections would not decrease to LOS E or worse as a result of the project; therefore, further analysis is not required. Accordingly, the proposed project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the proposed project would result in a less than significant impact with regard to potential CO hotspots. No mitigation is required.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors are multi-family residential land uses located to the west of the proposed project site.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. “Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.⁶ TACs that would potentially be emitted during construction activities associated with development of the proposed project would be diesel particulate matter.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM₁₀ (representative of diesel particulate matter) exposure would be minimal. According to the OEHHA, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident. However, such assessments should also be limited to the period/duration of activities associated with the project. The duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. The construction period for the proposed project would be approximately 20 months, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

Following completion of on-site construction activities, the proposed project would not involve routine operational activities that would generate TAC emissions other than intermittent maintenance and testing of the diesel emergency generator, which would be limited to 50 hours per year. (SCAQMD Rule 1470 limits operation of emergency generators to 50 hours per year for maintenance and testing). Due to this relatively short period of exposure, small engine size of the emergency generator (300 kW), and minimal on-site particulate emissions from other sources, TACs generated during operation would not result in concentrations causing significant health risks.

For the reasons described above, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project, and impacts would be less than significant. No mitigation is required.

Health Effects of Criteria Air Pollutants

Construction of the proposed project would generate criteria air pollutant emissions; however, the project would not exceed the SCAQMD mass-emission thresholds.

Health effects associated with O₃ include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019). VOCs and NO_x are precursors to O₃, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. Thus, existing O₃ levels in the SCAB are at unhealthy levels during certain periods. Because the proposed project would not involve construction or operational activities that would result in O₃ precursor emissions (VOC or NO_x) in excess of the SCAQMD thresholds, the project is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

Exposure to NO₂ and NO_x can irritate the lungs, cause bronchitis and pneumonia, lower resistance to respiratory infections, and enhance allergic responses (CARB 2019). Project construction and operation would not exceed the SCAQMD NO_x threshold, and existing ambient NO₂ concentrations are below the NAAQS and CAAQS. Thus, implementation of the proposed project is not expected to exceed the NO₂ standards or contribute to associated health effects.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less than significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing (EPA 2016). The SCAB is designated as nonattainment for PM₁₀ under the CAAQS and nonattainment for PM_{2.5} under the NAAQS and CAAQS. Implementation of the proposed project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed the SCAQMD's thresholds. Accordingly, the proposed project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants. Impacts would be less than significant. No mitigation is required.

In summary, the proposed project would not result in a potentially significant contribution to regional concentrations of non-attainment pollutants and would not result in a significant contribution to the adverse health effects associated with those pollutants. Impacts would be **less than significant**. No mitigation is required.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less Than Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction would be less than significant.

SCAQMD provides a list of land uses associated with odor concerns, which include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The proposed project includes operation of residences, retail, and restaurant spaces, which are not anticipated to generate odors and does not result in operation of the types of land uses listed in SCAQMD's screening criteria. For the reasons described above, project construction and operation would result in an odor impact that would be **less than significant**. No mitigation is required.

⁶ Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

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3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

No Impact. Fifty-eight plant species and forty-nine wildlife species have recorded occurrences in the U.S. Geologic Survey's *Baldwin Park, California* 7.5-minute topographic quadrangle and surrounding quadrangles (CDFW 2019, CNPS 2019); however, no native habitat is located on the project site or on the

adjacent properties. The project site is located in an urbanized area (downtown Covina) and is surrounded by urban land uses. The project site is fully developed with paved areas and structures. Vegetation on the project sites consists of several shrubs within a planter along the site's San Bernardino Road frontage and a small section of ornamental landscaping separating the northern segment of the site from the City's Metrolink parking structure. Given this, the project site is not a location that supports habitat for candidate, sensitive, or special-status species. As stated in the TCSP, the planning area is a "developed, urban environment completely surrounded by urban development, and as such is free of rich biological habitat and other sensitive environmental features" and "does not include important habitat for special-status species" (City of Covina 2004). For these reasons, no special-status species are expected to occur in the project area, and development of the proposed project would not remove or modify suitable habitat for special-status species. As such, **no impact** to candidate, sensitive, or special-status species would occur.

- b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

No Impact. There are no riparian habitat areas located on or within the vicinity of the project site (USFWS 2017). As stated in the TCSP, there are no surface water features in the TCSP area (City of Covina 2004). Vegetation on the site consists of sparse ornamental plantings that do not constitute a sensitive natural community. As such, **no impact** to riparian habitats or other sensitive natural communities would occur as a result of project implementation.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

No Impact. There are no wetlands located on or adjacent to the project site (USFWS 2017). As stated in the TCSP, there are no surface water features in the TCSP area (City of Covina 2004). As such, the project would have **no impact** on federally protected wetlands.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Less Than Significant with Mitigation Incorporated. There are no wetlands or water bodies within the project area; therefore, the proposed project would have no potential to affect the movement of migratory fish. No native habitat is located on the project site or on the adjacent properties. The project site is located in an urbanized area (downtown Covina) and is surrounded by urban land uses. The project site is fully developed with paved areas and structures. Vegetation on the project sites consists of several shrubs within a planter along the site's San Bernardino Road frontage and a small section of ornamental landscaping separating the northern segment of the site from the Covina Metrolink parking structure. Given this, the project site is not a location that supports habitat for wildlife species or that could serve as a wildlife corridor or native wildlife nursery site. However, there is some vegetation on and adjacent to the project site that would have the potential to provide nesting sites for birds that are protected under Section 3503.5 of the Fish and Game Code and under the Migratory Bird Treaty Act of 1918 (MBTA). Specifically, there is a dense row of ornamental vegetation separating the project site from the Covina Metrolink parking structure to the north.

Due to the proximity of one of the existing on-site structures to this strip of vegetation, demolition of the structure would result in disturbance and/or removal of this vegetation. In the event that nesting birds are using the trees, project construction could result in a significant impact. However, implementation of mitigation measure **MM-BIO-1** would ensure that impacts to nesting birds would be less than significant. Once the proposed project has been constructed, construction-related disturbances would not occur, and landscaping trees would be planted on the project site. As such, the site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, long-term impacts to nesting and migratory birds would not be significant. Construction impacts to nesting birds would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-BIO-1 If vegetation removal and/or outdoor construction activities will occur during the migratory bird nesting season (i.e., between February 15 and August 31), preconstruction surveys for nesting migratory birds and raptors shall be conducted by a qualified biologist, up to 14 days before initiation of construction activities. The qualified biologist shall survey the construction zone and a 250-foot radius surrounding the construction zone (500-foot radius within suitable raptor nesting habitat) to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds and/or raptors. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall flag and demarcate the location of nesting birds and/or raptors. Temporary avoidance of active nests, including the enforcement of an avoidance buffer as determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive. The biological monitor shall have the authority to cease construction if there is any sign of distress to a raptor or migratory bird.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The City's Heritage Trees are protected by the Municipal Code Chapter 17.83, which sets forth the provisions of the City's Tree Preservation Ordinance. This ordinance prohibits the damaging of designated heritage trees within the City. Heritage trees are defined in Section 17.83.020 of the ordinance as all species of oak tree and as any individual tree or groups of trees that have been specifically designated as heritage trees by the City Council (Covina Municipal Code Chapter 17.83).

As stated above in 3.4(b) and 3.4(d), there are no trees, vegetation, or landscaping on the project site or within the general vicinity of the project site. No trees would be removed as part of the proposed project and the project would not conflict with any local policies or ordinances protecting biological resources. **No impact** would occur.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The General Plan does not designate any portions of the City as being within a habitat conservation plan (City of Covina 2000). Furthermore, the project area is not within any of the regional conservation plans designated by the state (CDFW 2019b). Therefore, implementation of the project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. **No impact** would occur.

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3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

No Impact. The project site is located within a developed, urban context. No previously recorded historical resources were identified on the project site or in the immediate vicinity as a result of the cultural resources records search (Appendix C). However, because the existing concrete buildings were built between 1952 and 1965, a historic evaluation was conducted for the project site. The evaluation found that none of the existing buildings were associated with: a) historical events, b) the history and development of the City, c) an architect of historical significance or, d) a larger historical district. As such, and due to historic alterations to the existing buildings that have affected their integrity, the project site was determined ineligible for listing in the National Register of Historic

Places (NRHP) and the California Register of Historical Resources (CRHR) and is not considered eligible for a local designation or a City of Covina Landmark or Structure of Merit as per the City's Municipal Code 17.81.050. While some historical resources are also considered archaeological resources, such resources are addressed in Section 3.3(b), as part of the discussion of archaeological resources.

The nearest previously recorded cultural resources to the project site are the Mojave Road and the Covina Theater. The Mojave Road is designated California Historical Landmark No. 963, a segment of which lies approximately three blocks south of the project site. The Mojave Road was once utilized as a Native American trail, a federal government supply and mail route, and a freight route (Appendix C). The Covina Theater (Center for the Performing Arts) is located approximately 0.3 mile south of the project site at 104 North Citrus Avenue. The proposed project would not include any construction-related activities in the immediate vicinity of either historic resource. Upon project operation, the proposed project would not include a land use that would contribute to a substantial adverse change in the significance of either historic resource. Therefore, **no impact** would occur.

b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less Than Significant with Mitigation Incorporated. In order to determine the archaeological sensitivity of the project site, a cultural resources report was compiled. The report includes records search results, Sacred Lands File search results, and communication with local Native American groups.

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) for the project site and surrounding area within a one-half mile radius. The results of the records search are included as Appendix C of this document. The CHRIS search included a review of the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of all available historic U.S. Geological Survey 7.5- and 15-minute quadrangle maps.

No previously recorded resources were identified within the project area as a result of the SCCIC records search. However, the SCCIC records search identified five previous studies and two previously recorded cultural resources within a half-mile radius of the project area. One of the previously recorded cultural resources is a built environment resource (the Covina Theater) and another is the Mojave Road, which is a historical landmark.

As part of the process of identifying cultural resources within or near the project site, the Native American Heritage Commission (NAHC) was contacted to request a review of the Sacred Lands File (SLF). The NAHC responded stating that the SLF search was returned with negative results. A Native American Tribal Consultation List was also provided in the NAHC response letter. Tribal groups on this list and otherwise known to have affiliations to the project vicinity were contacted. Chairperson Andrew Salas of the Gabrieleno Band of Mission Indians responded and expressed concern over the presence of several Gabrieleno villages near the project area.

Because the project site is completely developed (containing structures and paved surfaces), an archaeological survey was not conducted for the project. However, the presence of known Gabrieleno villages in the surrounding area indicates that the project area may be sensitive for buried cultural resources below the existing infrastructure (Appendix C). As such, there is a possibility of encountering previously undiscovered

archaeological resources at subsurface levels during ground-disturbing activities associated with the proposed project. Implementation of mitigation measure **MM-CUL-1** would ensure that potential impacts to archaeological resources during construction activities are reduced to below a level of significance. Impacts would therefore be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-CUL-1 Native American and archaeological monitoring of all project-related ground-disturbance activities shall be required. A Native American monitor who has familiarity with the local archaeology, as well as an archaeological monitor, shall be retained at the expense of the applicant. Monitoring activities shall be conducted under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology. If archaeological and Native American resources are encountered during ground-disturbing activities, all earth-disturbing work within 50 feet of the discovery shall be temporarily suspended or redirected until an archaeologist and a Native American Monitor has evaluated the nature and significance of the find. Evaluation of significance for the find may include the determination of whether or not the find qualifies as an archaeological site. Depending upon the significance of the find under CEQA (California Code of Regulations Title 14 Section 15064.5(f); Public Resources Code Section 21082), the archaeologist may exhaust the data potential of the find through the process of field-level recordation and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

c) ***Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

Less Than Significant with Mitigation Incorporated. There is no indication that human remains are present within the boundaries of the project site. In the unlikely event that excavation activities during construction inadvertently uncover buried human remains, implementation of **MM-CUL-2** would reduce potential impacts below a level of significance. Impacts would therefore be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-CUL-2 In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

References

None.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Less Than Significant Impact. The construction and operation of the proposed project would require the consumption of energy resources in several forms at the proposed project site and within the proposed project site area. In general, the aggregated-temporary (approximate 20-month), construction energy consumption would be less than energy consumed during the long-term operation of the facility. An overview of the forms of energy consumption for construction and operation is provided as follows:

Construction Energy Consumption

1. Temporary Direct Electrical Service: Energy Provided by Southern California Edison (SCE)
 - Construction site lighting;
 - Computer equipment; and
 - Temporary construction trailer operation
2. Fossil Fuels (Diesel and Gasoline)
 - Off-road construction equipment
 - Diesel-fired electric generators
 - Worker vehicles, vender trucks, and haul trucks

Operational Energy Consumption

1. Direct Electrical Service: Energy Provided by SCE
 - Building heating, ventilation, and air conditioning (HVAC)
 - Lighting: interior and exterior facilities
 - Computer, audio and video equipment; and
 - Appliances

2. Indirect Energy Consumption
 - Supply, distribution, and treatment of water and wastewater; solid waste
3. Fossil Fuels (Diesel and Gasoline) Transportation
 - Townhome Residences;
 - Retail employees, delivery, and customers; and
 - Restaurant employees, delivery, and customers.

Construction and operational energy consumption is evaluated in detail below.

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers) would be provided by SCE. The electricity used for such activities would be temporary and would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the proposed project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with demolition and construction activities would rely on diesel fuel, as would vendor trucks involved in delivery of materials to the project site. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel in gasoline-powered light-duty vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix B lists the assumed equipment usage for each phase of construction. The project's construction equipment is estimated to operate a total combined 44,888 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Construction is estimated to occur in 2019 through 2021 based on the construction phasing schedule. The analysis assumes a construction start date of August 2019, which represents the earliest date construction would initiate. In the event construction is started later than August 2019, the analysis performed represents the worst-case scenario for energy consumption, because equipment and vehicle efficiencies for later years would be slightly greater due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2018). The estimated diesel fuel usage from construction equipment is shown in Table 3.6-1.

Table 3.6-1. Construction Equipment Diesel Demand (Off-Road Equipment)

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	kg/CO ₂ /Gallon	Gallons
Demolition	3	37.37	10.21	3,659.8
Site Prep and Grading	7	76.05	10.21	7,448.2
Trenching	5	100.75	10.21	9,867.7
Building Construction	12	668.45	10.21	65,470.5
Paving	4	36.22	10.21	3,547.4
Architectural Coating	3	72.28	10.21	7,079.7
Total				97,073.3

Sources: Pieces of equipment and equipment CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker, vendor, and haul truck trips are estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline and vendor/hauling vehicles are assumed to be diesel. Calculations for total worker, vendor, and haul truck fuel consumption are provided in Table 3.6-2, Table 3.6-3, and Table 3.6-4.

Table 3.6-2. Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Demolition	880	4.64	8.78	528.3
Site Prep and Grading	1,056	5.56	8.78	633.6
Trenching	1,308	6.68	8.78	761.4
Building Construction	16,350	83.03	8.78	9,457.1
Paving	720	3.68	8.78	419.1
Architectural Coating	2,784	14.06	8.78	1,601.3
Total				13,400.7

Sources: Trips and vehicle CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

Table 3.6-3. Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Demolition	0	0	10.21	0
Site Prep and Grading	0	0	10.21	0
Trenching	0	0	10.21	0
Building Construction	6,540	81.24	10.21	7,956.7
Paving	540	6.72	10.21	658.0
Architectural Coating	696	8.63	10.21	845.6
Total				9,460.3

Sources: Trips and vehicle CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

Table 3.6-4. Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Demolition	0	0	10.21	0
Site Prep and Grading	0	0	10.21	0
Trenching	616	23.48	10.21	2,299.7
Building Construction	0	0	10.21	0
Paving	0	0	10.21	0
Architectural Coating	0	0	10.21	0
Total				2,299.7

Sources: Trips and vehicle CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

In summary, construction of the project is conservatively anticipated to consume 13,401 gallons of gasoline and 108,833 gallons of diesel over approximately 20 months. By comparison, California's consumption of petroleum is approximately 74.8 million gallons per day. Based on these assumptions, approximately 55.6 billion gallons of petroleum would be consumed in California over the course of the construction period (EIA 2017). Within Los Angeles County, approximately 9,997 million gallons of petroleum (gasoline and diesel) would be consumed over the course of the construction period (CARB 2018). Therefore, impacts associated during construction would be less than significant. No mitigation is required.

Operation

Electricity

Operation of the project upon buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water and wastewater would indirectly result in electricity usage. Electricity consumption associated with project operation is based on CalEEMod outputs presented in Appendix B.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The project involves both residential and non-residential uses. For residential energy use, CalEEMod uses data collected during the Residential Appliance Saturation Survey to develop energy intensity values (electricity and natural gas per square foot per year). The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. For parking lots, CalEEMod includes calculation of energy use from lighting, ventilation, and elevators in parking lots and structures. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to California Building Standards Code (Title 24) requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to California Building Standards Code requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

The California Building Standards Code serves to enhance and regulate California's building standards. The Building Energy Efficiency Standards are part of the California Building Standards Code (specifically, Part 6 of Title 24). The most recent version of the Building Energy Efficiency Standards is referred to as the "2016 Building Energy Efficiency Standards" and went into effect in January 2017. Energy consumption would be reduced through installation of high-efficiency lighting incorporated in the parking garage and all

common areas. In addition to installing LED lighting in all common areas, non-security or wayfinding lighting would include motion sensors to ensure that energy used for lighting is only used when needed. The applicant proposes to generate some energy on site, offsetting energy from the grid, via installation of rooftop solar with a preliminarily estimated nameplate capacity of 240 kW-DC resulting in an estimated 420 MWh-AC output. As a result, the proposed project would consume approximately 1,840,108 kilowatt-hours (kWh) per year during operation. For comparison, in 2017 the total residential and non-residential electricity demand in Los Angeles County was 67,569,242,472 kWh (CEC 2018).

Natural Gas

Project operation would require natural gas for various purposes, including water heating and natural gas appliances. Natural gas consumption associated with operation is based on the CalEEMod outputs (see Appendix B).

CalEEMod default values for energy consumption for each land use were applied for the project analysis. For residential energy use, CalEEMod uses data collected during the Residential Appliance Saturation Survey to develop energy intensity values (electricity and natural gas per square foot per year). The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to California Building Standards Code requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to California Building Standards Code requirements (such as appliances, electronics, and miscellaneous “plug-in” uses). Based on CalEEMod estimations, the proposed project would consume approximately 3,664,458 kilo-British Thermal Units (kBtu) per year. For comparison, in 2017 the non-residential natural gas use within Los Angeles County was 295,601,223,219 kBtu (CEC 2018).

Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site including townhome residents, retail and restaurant customers, deliveries, and employees.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the vehicle miles traveled (VMT) as a result of project operation. The annual VMT attributable to the proposed project is expected to be 4,453,673 VMT (Appendix B). Similar to the construction worker and vendor trips, fuel consumption from operational trips are estimated by converting the total CO₂ emissions from operation of the project to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, 92.3% of the fleet range from light-duty to medium-duty vehicles and motorcycles are assumed to run on gasoline. The remaining 7.7% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses and are assumed to run on diesel.

Calculations for annual mobile source fuel consumption are provided in Table 3.6-4 (gasoline) and Table 3.6-5 (diesel).

Table 3.6-5. Annual Mobile Source Gasoline Demand

	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Operation	1,839.41	8.78	209,500.54

Sources: Trips and vehicle CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram

Table 3.6-6. Annual Mobile Source Diesel Demand

	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Operation	154.33	10.21	15,115.97

Sources: Trips and vehicle CO₂ (Appendix B); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram

Over the lifetime of the project, the fuel efficiency of vehicles used by townhome residents, retail and restaurant customers, and employees, as well as vehicles used for deliveries to the project site, is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2013). Additionally, in response to Senate Bill 375, CARB adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by 2020, and 18% by 2035 for light-duty passenger vehicles in the SCAG planning area. As such, operation of the project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

Summary

The proposed project would create additional electricity and natural gas demand by adding new residential housing units and commercial space. However, the project would be subject to the 2016 Building Energy Efficiency Standards, which apply to new construction and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. Compliance with the 2016 Building Energy Efficiency Standards would ensure that the energy efficiency of the proposed buildings is maximized to the extent feasible. Furthermore, as described above, the proposed project would incorporate solar panels, which would partially offset its energy demand.

Similarly, the project would be associated with increased petroleum use during construction and operation. However, the use would be a small fraction of state- and County-wide use and, due to advances in fuel economy, vehicles would use less petroleum over time. Additionally, the proposed project would be situated approximately 500 feet from the Covina Metrolink Station, which is within a walkable distance. The project is also located in downtown Covina, in walking distance to stores and restaurants. As such, the location of the project would encourage residents and retail/restaurant patrons to access the site via walking and/or public transit. The location of the project would, therefore, maximize the project's efficiency relative to petroleum use. For these reasons, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy. Impacts would be **less than significant**, and no mitigation is required.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less Than Significant Impact. The proposed project would be subject to state regulations for energy efficiency, namely, California's Building Energy Efficiency Standards and CalGreen, both of which are set forth in the California Code of Regulations, Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated periodically (every 3 years) to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The 2016 CALGreen standards became effective on January 1, 2017. The proposed project would meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency.

At a regional level, the proposed project would be subject to the policies set forth in SCAG's 2016 RTP/SCS. The RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the project, the strategies and policies set forth in the 2016 RTP/SCS include improved energy efficiency. The 2016 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed previously, the project would comply with the 2016 CALGreen standards. Additionally, the project would include rooftop solar with a preliminarily estimated nameplate capacity of 240 kW-DC resulting and an estimated 420 MWh-AC output. Finally, high-efficiency lighting would be incorporated in the parking garage and all common areas. In addition to installing LED lighting in all common areas, non-security or wayfinding lighting would include motion sensors to ensure that energy used for lighting is only used when needed. For these reasons, the proposed project would be consistent with the SCAG 2016 RTP/SCS.

At a local level, the proposed project would be subject to the City's Energy Action Plan (EAP). In 2012, twenty-seven of the thirty-one San Gabriel Valley Council of Government (SGVCOG) member agencies, including the City of Covina, participated in an EAP project, funded by California utility ratepayers and administered by SCE. The funding was awarded to the SVGCOG to implement activities to achieve statewide energy efficiency goals. The resulting City of Covina EAP is therefore part of a unified regional framework for meeting long-term energy efficiency goals. The City's EAP identifies a comprehensive set of electricity-related energy efficiency targets, goals, policies, and actions to help the City become more energy efficient. The project would be consistent with the EAP and would specifically further implementation of the following policies (City of Covina 2012):

- Policy 3.1: Maximize the energy-efficient design and orientation of new, remodeled, and renovated buildings through voluntary sustainability building standards.
- Policy 3.2: Encourage the use of energy-efficient appliances and equipment in new buildings.

Project compliance with the 2016 CALGreen standards further demonstrates the project's consistency with the City of Covina's EAP.

The proposed project would follow applicable energy standards and regulations during construction. In addition, the proposed project would be built and operated in accordance with all existing, applicable regulations at the time of construction. As such, the proposed project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the proposed project would be **less than significant**. No mitigation is required.

References

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3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. A preliminary geotechnical report was prepared for the proposed project by Leighton and Associates, Inc. (Leighton) and is included as Appendix D to this document. Investigations conducted by Leighton included a literature review of active faults in the area. The review indicated that there are no known active faults traversing the project site. The closest known active or potentially active fault is the San Jose fault, located approximately three miles southeast of the project site (Appendix D). Therefore, the proposed project is not expected to expose people or structures to ground rupture from a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. Furthermore, project construction and operation would not increase the probability or exacerbate the potential for fault rupture to occur. **No impact** would occur.

ii) **Strong seismic ground shaking?**

Less Than Significant Impact. As with most of Southern California, the project site could be subject to seismic ground shaking in the event of an earthquake. As stated in the preliminary geotechnical report (Appendix D), the principal seismic hazard that could affect the site is ground shaking resulting from an earthquake occurring along several major active or potentially active faults in Southern California. The known regional active and potentially active faults that could produce the most significant ground shaking

at the project site include the San Jose, Sierra Madre, Raymond, Clamshell, Chino (Elsinore), Whittier, Cucamonga, Elysian Park, Verdugo, and Hollywood Thrust Faults (Appendix D). Leighton calculated a design peak ground acceleration for seismic analysis of the project site and set forth recommendations in their report for designing the project in a manner that would reduce the effects of seismic ground shaking.

Generally, adequate engineering and construction techniques have been developed to reduce the risk of damage to structures from ground shaking to acceptable levels. The proposed project would be designed to resist seismic forces in accordance with the criteria contained in the California Building Code. The project applicant would be required to obtain a building permit from the City, which would ensure that project plans and specifications are in compliance with the California Building Code and local ordinances. Furthermore, the proposed project would be designed and built in accordance with the applicable recommendations provided by Leighton. Since there are no other conditions present on site that would amplify or otherwise worsen the effects of ground shaking (e.g., unstable slopes), design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize public exposure to earthquake risks to the extent practicable. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for strong seismic ground shaking to occur. Impacts would be **less than significant**. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. According to the preliminary geotechnical report, the project site is not located within a zone susceptible to seismic-related ground failure, including liquefaction, as mapped on state liquefaction hazards maps (Appendix D). Additionally, the historically highest groundwater levels on the project site are 200 feet below ground surface. As such, the potential for liquefaction at the project site is very low. Other types of seismic-related ground failure identified in the geotechnical report include seismically induced settlement and seismically induced landslides. Landslides are discussed below under Section 3.7(a)(iv). Regarding settlement, the preliminary geotechnical report analyzed the potential for seismically induced settlement using the maximum considered earthquake peak ground acceleration. The results of these analyses suggested that the on-site soils are susceptible to approximately two inches of seismic settlement based on the maximum considered earthquake (Appendix D). Although seismically induced settlement has the potential to occur, it would not present an adverse geologic condition on the project site. Additionally, design and construction of the project in accordance with the California Building Code, local requirements, and the recommendations in the site-specific geotechnical report would minimize public exposure to earthquake risks such as liquefaction and settlement to the extent practicable. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for seismic-related ground failure to occur. Thus, impacts related to seismic-related ground failure, including liquefaction, would be **less than significant**. No mitigation is required.

iv) Landslides?

No Impact. The project site is level without significant slopes. The project site is not considered susceptible to static slope instability or seismically induced landslides (Appendix D). Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for landslides to occur. Given this, **no impact** would occur.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Less Than Significant Impact. Ground surface disruption during grading and excavation of the project site could result in soil erosion or the loss of topsoil. Given that the project site is larger than one acre, the project applicant would be required to apply for coverage under the Construction General Permit (CGP). The CGP requires preparation of and compliance with a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would include conditions to protect receiving waters from degradation that could result from construction activities, including construction-related erosion and loss of topsoil. Conditions would include the adherence to best management practices (BMPs) designed to minimize the potential for soil erosion and the loss of topsoil, such as the use of sandbag barriers, dust controls, spill prevention and control, perimeter controls, waste management, drain inlet protection, and proper construction site housekeeping practices. Implementation of BMPs would minimize erosion during ground disturbance to the extent feasible.

Section 8.50.100 of the City's Municipal Code outlines the mandatory elements of the City-required erosion and sediment control plan, which must include all elements of a SWPPP, methods to minimize disturbed areas, controls to prevent tracking on and off the site, non-stormwater controls, identification of site risk level, rationale for the selection and design of the BMPs, among other stormwater and erosion management practices.

During operation, the project site would be covered with buildings, hardscape, and landscaping, which would preclude erosion. Adherence to existing regulations and implementation of standard construction practices would ensure that soil erosion impacts are **less than significant**. No mitigation is required.

c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less Than Significant Impact. As described under Sections 3.6(a)(iii) and 3.6(a)(iv), the project site is not known to be susceptible to liquefaction hazards or landslide hazards. Further, the General Plan Safety Element states that liquefaction, settlement, and subsidence are issues that have not been detected in the City (City of Covina 2000). According to the preliminary geotechnical report, there are potentially compressible soils on the project site. This could represent a geotechnical issue as adverse total and differential soil settlement could occur, and, in wet conditions, could result in hydrocollapse. However, with adherence to the recommendations outlined in the preliminary geotechnical report, which specifically require the partial removal and recompaction of the compressible soils located under shallow foundations, the potential for settlement and hydrocollapse would be reduced to a less-than-significant level (see Appendix D for details).

Incorporation of the applicable geotechnical recommendations summarized above, compliance with the California Building Code, and design review by the City as part of the building permit process would ensure that the project is designed and constructed to minimize soil-related hazards, including the potential for settlement of compressible soils. As such, impacts would be **less than significant**. No mitigation is required.

- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. According to the preliminary geotechnical report, soil samples showed that surface and sub-surface soil at the project site has a very low expansion potential. In the event that such soils are present on-site, incorporation of site-specific geotechnical recommendations, compliance with the California Building Code, and design review by the City as part of the building permit process would minimize the potential for the proposed project to be compromised by expansive soils. Furthermore, implementation of the proposed project would not increase the probability or exacerbate the potential for soil expansion to occur. Impacts would therefore be **less than significant**. No mitigation is required.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The project would use the regional sewer system for disposal of wastewater, and therefore, would not require septic tanks or other alternative wastewater disposal systems. As such, **no impact** would occur.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less Than Significant with Mitigation Incorporated. The project site is located in a relatively flat-lying area within the City of Covina. In this area, surface-mapped sedimentary deposits consist of younger Quaternary alluvial fan deposits derived from the South Hills and the San Gabriel Mountains to the northeast (Dibblee and Ehrenspeck 1999; McLeod 2017). These Holocene, or Recent, deposits presumably overlie older, Pleistocene, or “Ice-Age” deposits at an unknown depth (Dibblee and Ehrenspeck 1999; McLeod 2017). The coarse-grained, younger, alluvial deposits have low paleontological resource sensitivity. However, older, finer-grained Pleistocene age deposits in this area have produced scientifically significant vertebrates and have moderate to high paleontological resource sensitivity (McLeod 2017).

Past excavation and trenching activities in the area surrounding the project site have encountered paleontological resources in older Quaternary alluvial deposits. According to the records search results received from the Natural History Museum of Los Angeles County (LACM), included in Appendix C of this IS/MND, the closest fossil locality within older Quaternary alluvial deposits is located in English Canyon, south-southeast of the project area and southwest of the City of Chino. This locality, LACM 1728, yielded Pleistocene age mammals, including extinct horse (*Equus*) and camel (*Camelops*) remains at depths between 15 feet and 20 feet below the ground surface (McLeod 2017).

No paleontological resources were identified within the project site as a result of the institutional records search and desktop geological review. Furthermore, the project site is located within an area that has been previously developed and is likely underlain by fill materials, at least in part. As such, the project site is not anticipated to be underlain by unique geologic features. While the project area has been heavily disturbed by urban development over the years, intact paleontological resources may be present below the original layer of fill material. Given the occurrence of past fossil discoveries in the surrounding area and the underlying alluvial fan deposits, the project site is moderately to highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are located on the project site, ground-disturbing activities associated with construction of the proposed project, such as grading during

site preparation, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of **MM-GEO-1**, impacts would be reduced to below a level of significance. Impacts of the proposed project are therefore considered **less than significant with mitigation incorporated**. No further mitigation is required.

MM-GEO-1 Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. The qualified paleontologist shall attend the preconstruction meeting and be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed older Quaternary alluvial deposits, if encountered. These deposits may be encountered at depths as shallow as five feet to ten feet below ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontology monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP) (2010).

References

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- Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. 11 p. Available; <http://vertpaleo.org/PDFS/68/68c554bb-86f1-442f-a0dc-25299762d36c.pdf>.

3.8 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Less Than Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).⁷ The three GHGs evaluated herein are CO₂, CH₄, and N₂O, because these are the only GHG gases that would be emitted during project construction and/or operations.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO₂; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO₂ equivalent (CO₂e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH₄ is 25 (i.e., emissions of 1 MT of CH₄ are equivalent to emissions of 25 MT of CO₂), and the GWP for N₂O is 298, based on the Intergovernmental Panel on Climate Change Assessment Report (IPCC 2007).

As discussed in Section 3.3 of this IS/MND, the proposed project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of

⁷ Climate-forcing substances include GHGs and other substances such as black carbon and aerosols. This discussion focuses on the GHGs identified in the California Health and Safety Code Section 38505 and applicable to the project, which are CO₂, CH₄, and N₂O; impacts associated with other climate-forcing substances are not evaluated herein, as they would not be generated by the project.

residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008). The 10,000 MT CO₂e per-year threshold, which was derived from GHG reduction targets established in Executive Order (EO) S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial projects (1,400 MT CO₂e per year), and mixed-use projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

To determine the proposed project's potential to generate GHG emissions that would have a significant impact on the environment, the proposed project's GHG emissions were compared to the mixed-use land use type quantitative threshold of 3,000 MT CO₂e per year. Because the project proposes a combination of commercial and residential land uses, the 3,000 MT CO₂e per year threshold, which was identified under Tier 3 Option 1 for mixed-use projects and Option 2 for all non-industrial projects, was conservatively applied herein. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the proposed project, which is assumed to be 30 years (SCAQMD 2008). Thus, this impact analysis compares estimated operational emissions plus amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO₂e per year.

Construction Emissions

Construction of the proposed project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. A depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 3.3-1 and in Appendix B. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 3.8-1 presents construction GHG emissions for the proposed project from on-site and off-site emissions sources. The analysis assumes a construction start date of August 2019, which represents the earliest date construction would initiate. In the event construction is started later than August 2019, the analysis performed represents the worst-case scenario for GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.8-1. Estimated Annual Construction GHG Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
2019	157.36	0.04	0	158.31
2020	879.87	0.16	0	883.76
2021	199.63	0.03	0	200.35
Total	1,236.86	0.22	0	1,242.41
Amortized Over 30 Years				41.41

Source: See Appendix B for complete results.

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

As shown in Table 3.8-1, the estimated total GHG emissions in 2019 through 2021 would be approximately 1,242 MT CO₂e. Amortized over 30 years, construction GHG emissions would be approximately 41 MT CO₂e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operational Emissions

Operation of the proposed project would generate GHG emissions through motor vehicle trips to and from the project site; landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution; and wastewater treatment. GHG emissions would also be generated through intermittent maintenance and testing of the diesel emergency generator, limited to 50 hours per year. CalEEMod was used to calculate the annual GHG emissions. GHG emission estimates were based on the mobile source, area source, and energy (natural gas) operational assumptions described in Section 3.3(b), within the air quality analysis. CalEEMod default values were used to estimate GHG emissions associated with energy (electricity) consumption, solid waste, and water and wastewater. The applicant proposes to install rooftop solar with a preliminarily estimated nameplate capacity of 240 kW-DC resulting and an estimated 420 MWh-AC output. The solar energy output was accounted for in CalEEMod as on-site renewable energy mitigation.

The estimated operational (2021) project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and stationary sources are shown in Table 3.8-2. While the first full year of operation is traditionally assumed for air quality analyses, because the proposed project construction would be completed in April 2021, year 2021 was conservatively assumed as the operational year instead of 2022. In the event operation is started later than these projections, the analysis performed represents the worst-case scenario for GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.8-2. Estimated Annual Operational GHG Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>metric tons per year</i>			
Area	2.72	0.00	0.00	2.79
Energy	688.21	0.03	0.01	691.31
Mobile	1,990.96	0.11	0.00	1,993.75
Stationary	6.41	0.01	0.00	6.75
Solid waste	13.55	0.80	0.00	33.56
Water supply and wastewater	75.47	0.02	0.01	79.03
Total	2,777.33	0.97	0.02	2,807.20
<i>Amortized Construction Emissions</i>				<i>41.41</i>
Operation + Amortized Construction Total				2,848.61

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent
See Appendix B for detailed results. These emissions reflect operational year 2021.

As shown in Table 3.8-2, estimated annual project-generated GHG emissions would be approximately 2,807 MT CO₂e per year as a result of proposed project operations only. Estimated annual project-generated operational emissions in 2021 (2,807 MT CO₂e per year) plus amortized project construction emissions (41 MT CO₂e per year) would be approximately 2,849 MT CO₂e per year, which would not exceed

the recommended SCAQMD threshold of 3,000 MT CO₂e per year. Therefore, in relation to the generation of GHGs, the proposed project's impact would be **less than significant**. No mitigation is required.

b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less Than Significant Impact. The City adopted an Energy Action Plan (EAP) in 2012; however, the EAP's scope was limited to energy and gas consumption and did not address strategies to reduce GHG emissions from other sources, such as transportation or solid waste. The City has not adopted a comprehensive climate action plan, and there is currently no local guidance that would be applicable to the proposed project. At this time, no mandatory GHG plans, policies, regulations, or finalized agency guidelines would apply to the proposed project. Nonetheless, project consistency with the City's EAP, SCAG's 2016 RTP/SCS, CARB's Scoping Plan, and statewide GHG reduction goals for 2030 and 2050 identified in EO S-3-05 and Senate Bill (SB) 32, is discussed below.

City of Covina's Energy Action Plan

As discussed in Section 3.6, Energy, in 2012 the City developed an EAP. The EAP demonstrates the City's commitment to pursue energy efficiency and reduce GHG emissions. The City's energy efficiency targets include support to achievement of a 15% reduction below baseline community GHG emissions by 2020. As described in Section 3.6, project compliance with the 2016 CALGreen standards demonstrates the project's consistency with the 2012 City of Covina EAP. As such, the proposed project would not conflict with the GHG reduction targets set forth in the City's EAP.

Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the project, the strategies and policies set forth in the 2016 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The proposed project's consistency with these three strategy categories is presented below.

1. **Consistency with VMT Reduction Strategies and Policies.** The proposed project's consistency with this aspect of the 2016 RTP/SCS is demonstrated via the project's land use characteristics and features that would reduce vehicular trips and VMT, as well as the project's consistency with the regional growth forecast assumed in the 2016 RTP/SCS for the City. As discussed in Section 3.14, Population and Housing, the proposed project would not induce substantial unplanned population growth in the area, neither directly or indirectly. Therefore, vehicle trip generation for the project site has been anticipated in the SCAG 2016

RTP/SCS growth projections because the increased population at the project site would fall within the City's predicted population projections.

Regarding VMT reduction characteristics, and as discussed in Section 2.3, the proposed project has been designed to encourage pedestrian activity. The overall project site would provide a combination of landscape and hardscape improvements that facilitate internal accessibility and encourage active transportation. Such improvements reflect the circulation objectives stated in the TCSP. Additionally, bicycle access to the project site would be provided by the existing street network. The City of Covina Bicycle Master Plan proposes a number of bicycle facilities near, or immediately adjacent to, the project site (City of Covina 2011). The proposed project is well-located to further facilitate and encourage bicycling as a mode of transportation as these facilities are constructed.

2. **Increased Use of Alternative Fueled Vehicles Policy Initiative.** The second goal of the 2016 RTP/SCS, with regard to individual development projects such as the proposed project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. This 2016 RTP/SCS policy initiative focuses on accelerating fleet conversion to electric or other near zero-emission technologies. The proposed project would be consistent with these strategies since the electric vehicle charging station requirements of the CALGreen Tier 1 standards would be implemented into the project.
3. **Energy Efficiency Strategies and Policies.** The third important focus within the 2016 RTP/SCS, for individual developments such as the proposed project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The proposed project would comply with the 2016 CALGreen Tier 1 standards, which would be required by the City, including demonstration that buildings have a 15% or greater reduction in its Energy Budget component compared to the Standard Design Building, as calculated by CALGreen Compliance Software approved by the Energy Commission.

The applicant proposes to install rooftop solar with a preliminarily estimated nameplate capacity of 240 kW-DC resulting and an estimated 420 MWh-AC output. Finally, high-efficiency lighting would be incorporated in the parking garage and all common areas. In addition to installing LED lighting in all common areas, non-security or wayfinding lighting would include motion sensors to ensure that energy used for lighting is only used when needed.

Based on the analysis above, the proposed project would be consistent with the SCAG 2016 RTP/SCS.

California Air Resources Board Scoping Plan

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.⁸ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet

⁸ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

(i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. To the extent that these regulations are applicable to the project, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Statewide GHG Reduction Goals for 2030 and 2050

The proposed project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in EO S-3-05 and SB 32. EO S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in the 2017 Scoping Plan, which states (CARB 2017):

The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Scoping Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The proposed project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the proposed project would not exceed the SCAQMD’s recommended threshold of 3,000 MT CO_{2e} per year (SCAQMD 2008). Because the proposed project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state’s trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

In addition, the specific path to compliance for the state in regards to the long-term, future goals will likely require development of new technology or other changes that are not currently known or available. As such, identifying ways that the project would be consistent with future goals would be speculative and cannot be meaningfully discussed at this time. However, the proposed project’s consistency with current goals, policies, and regulations would assist in meeting the City’s contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40% reduction target by 2030 and the EO S-3-05 80% reduction

target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the above considerations, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be **less than significant**, and no mitigation is required.

References

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3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Less Than Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Once construction is complete, construction-related hazardous materials would no longer remain on-site.

Hazardous materials that could be used once the proposed project is constructed would include chemical reagents, solvents, fuels, paints, cleansers, pesticides, fertilizers, and miscellaneous organics and inorganics that are used as part of building and grounds maintenance, as well as vehicle maintenance. The project applicant, building manager/operator, residents, and commercial tenants would be required to comply with all federal, state, and local laws regulating the management, use, storage, and transportation of hazardous materials. Specifically regarding household hazardous materials associated with the proposed residential development, the Sanitation Districts of Los Angeles County operates a Household Hazardous and Electronic Waste Program that facilitates safe disposal of household hazardous wastes such as motor oil, paint, florescent light bulbs, batteries, etc. The program includes one-day events hosted in cities throughout Los Angeles County, several Solvents/Automotive/Flammables/Electronics Collection Centers situated throughout Los Angeles County, and two permanent household hazardous waste collection centers (one in Palmdale and another in Signal Hill) (LACSD 2017). Through compliance with local, state, and federal regulations, implementation of the proposed project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials. Impacts are considered **less than significant**. No mitigation is required.

b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less Than Significant with Mitigation Incorporated. As described under Section 3.9(a), relatively small amounts of commonly used hazardous substances would be used during construction of the proposed project. Hazardous substances required for construction and any hazardous materials removed from the existing buildings would be handled, transported, and/or disposed of in accordance with all federal, state, and local laws. Upon required compliance with these existing regulations, upset and accident conditions involving hazardous substances during construction are not reasonably foreseeable.

Existing buildings, especially those constructed prior to the mid-1970s, have the potential to contain hazardous building materials such as asbestos-containing materials (ACM) or lead-based paint (LBP). As such, demolition at the project site may require removal and disposal of potentially hazardous building materials. A lead and asbestos survey was conducted for the project site by Evista Environmental Health Systems. Evista detected several building materials (floor tile, glue, black base cove etc.) that contained small amounts of asbestos as well as several lead-based paint or surface coatings in the existing buildings (Appendix E). During demolition of the existing buildings on site, these materials would be tested and removed from the existing structure in accordance with applicable local, state, and federal regulations, including SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Upon compliance with the applicable laws involving safe treatment and disposal of ACM, LBP, other potentially hazardous building materials, such materials would not pose a significant risk to the public or environment.

Additionally, a Phase I Environmental Site Assessment (ESA) conducted by Waterstone Environmental, Inc. (Appendix E) identified two recognized environmental conditions (RECs) on the project site. These RECs have the potential to create a significant hazard to the public or the environment during project construction due to the release of soil contamination and potential exposure of workers or the public to the contamination. However, with implementation of mitigation measure **MM-HAZ-1** and **MM-HAZ-2**, impacts would be reduced to a less than significant level.

Sanborn Fire Insurance Maps for 1929 and 1932 indicate that there was a Gas & Oil Station located on the southeast corner of the project site, and based on historical aerial photos, the Gas & Oil Station was removed sometime between 1954 and 1964. This historic Gas & Oil Station may pose a potential risk to human health and safety, since it could indicate the potential presence of soils that have been contaminated with petroleum. Implementation of mitigation measure **MM-HAZ-1** would ensure that any such soils are identified and handled safely.

MM-HAZ-1 The site of the historic gas and oil station shall be inspected during soil grading of the project site for any discolored soil or petroleum hydrocarbon odors, and if present, soil samples shall be collected. If petroleum-impacted soils are present above health risk based cleanup concentrations, they shall be excavated and properly disposed in accordance with federal, state, and local regulations.

As part of the Phase I ESA, Waterstone performed soil sampling activities to test beneath 36 hydraulic lifts that were removed from the project site. The soil sample results indicated that total petroleum hydrocarbons (TPH) oil were present in the soil beneath the hydraulic lift excavations and ranged in concentration from 19 milligrams per kilogram (mg/kg) in sample Lift-32C-10 to a high of 48,700 mg/kg in sample Lift-3C-10. The eight soil samples containing the highest TPH oil concentrations were also tested for polychlorinated biphenyls (PCBs), which were determined not to be present in detectable concentrations. Soil pile samples analyzed also indicated the TPH oil containing soil was free of measurable VOCs. The hydraulic oil that is present in the bottom of the excavations from the former hydraulic lifts has high viscosity and is relatively insoluble hydraulic oil. The conservative expected depth to groundwater at the site is approximately 100 feet below ground surface or greater. Based on this depth to groundwater along with the low toxicity of heavy range oil with no detectable VOCs, the residual hydraulic oil is not expected to present any significant threat to groundwater or unacceptable risk to human health or the environment. However, during soil excavation associated with construction, workers and/or the public could potentially be exposed to contamination present in the soils. Implementation of mitigation measure **MM-HAZ-2** would ensure that residual TPH oil beneath the hydraulic lift sites would be properly remove so as not to pose a threat to human health and safety.

MM-HAZ-2 The areas of impacted soil that exceed 10,000 milligrams per kilogram of total petroleum hydrocarbons shall be excavated and properly disposed of at a permitted soil disposal or treatment facility along with the existing on-site soil piles. Confirmation samples shall be collected to document the soil conditions upon completion of excavation activities to verify that the proposed cleanup goal (10,000 milligrams per kilogram) has been achieved at each hydraulic lift where the excavation is required.

During operation, the project would not involve the use of acutely hazardous materials. Furthermore, as described under item 3.9(a), regulations are in place at the federal, state, and local level that require hazardous materials to be stored, handled, and transported in a manner that minimizes the potential for their release into the environment. Upon compliance with these regulations and upon implementation of **MM-HAZ-1** and **MM-HAZ-2**, the likelihood of upset or accident conditions involving hazardous materials used during project construction and/or operation would be reduced to the extent practicable. Impacts would therefore be **less than significant with mitigation incorporated**. No further mitigation is required.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact. There are no schools located within one-quarter mile of the project site (California Department of Education 2014). The nearest school is Covina Elementary School, located approximately 0.5-mile southeast of the project site. As such, **no impact** would occur.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Less Than Significant with Mitigation Incorporated. A database search for sites listed on various federal and state databases on the project site and within the project vicinity was obtained from EDR, Inc. and included in the Phase I ESA in Appendix E. Because this database search is over one year old (December 2015), a second database search was conducted on April 9, 2019, to ensure that no new sites within the project area were added to regulatory databases between 2015 and the date of this IS/MND. The results of both the 2015 database search and the 2019 database search are contained in Appendix E.

The Phase I ESA and updated database search identified numerous hazardous materials listings surrounding the project site. Additionally, the project site itself is listed on the following databases:

- Hazardous Waste Tracking System (HAZNET)
- Recovered Government Archive, Leaking Underground Storage Tank (RGA LUST)
- Leaking Underground Storage Tank (LUST)
- Underground Storage Tank (UST)
- The Statewide Environmental Evaluation and Planning, Underground Storage Tank (SWEEPS UST)
- Los Angeles County, Hazardous Materials Search (HMS)
- Resource Conservation and Recovery Act, Small Quantity Generators (RCRA-SQG)
- EPA's Facility Index System (FINDS)
- Facility Inventory Database (CA FID UST)
- CARB, Emissions Inventory Data (EMI)
- EPA's Enforcement and Compliance History Online (ECHO).

The majority of these sites have no reported violations or leaks, and the presence of sites that store and/or generate hazardous substances is typical of commercial areas, particularly commercial areas with automobile-related businesses. According to the Phase I ESA, two RECs were identified on the project site: a historic gas and oil station and 16 historic hydraulic lifts. As described in Section 3.9(a), implementation of **MM-HAZ-1** and **MM-HAZ-2** would reduce potential impacts to a less-than-significant level. As such, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The project is located approximately six miles east of Brackett Field Airport. The project site is not located within the planning area for this airport, nor is it located within two miles of this airport or any other airport. **No impact** would occur relative to airport-related safety hazards.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. The City has prepared the “Covina Emergency Plan” for emergency response within the City. The multi-hazard Covina Emergency Plan addresses the City’s planned response to emergencies associated with natural disasters and hazardous materials incidents (City of Covina 2000). The proposed project would be required to comply with the multi-hazard Covina Emergency Plan. In the event of a disaster, the City’s emergency plan would go into immediate effect. According to the City’s General Plan Safety Element, all major public streets serve as the principal evacuation routes. These principal routes are well maintained to support an evacuation function to the extent feasible (City of Covina 2000). San Bernardino Road and Citrus Avenue, which are both adjacent to the project site, would thus be considered emergency evacuation routes. During construction-related activities, traffic along San Bernardino Road and Citrus Avenue may experience slight delays due to temporary lane closures, as well as the movement of construction workers and construction equipment to and from the project site. However, these delays would be temporary in nature and any lane closures would be implemented according to state and local traffic control regulations. In the event of an emergency, response and/or evacuations would proceed as planned, with or without the project. As such, project construction would not impair implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The proposed project would involve vacation of a portion of Geneva Place. The vacated portion would be developed into a central courtyard and emergency vehicle access driveway under the proposed project. Geneva Place is a local connector street, which does not serve as a local emergency evacuation route under existing conditions, and, as such, its removal would not impede an emergency response or evacuation plan. Furthermore, the vacated portion of Geneva Place would still provide emergency vehicle access to the proposed project, as would the proposed driveways off San Bernardino Road and 3rd Avenue. The Los Angeles County Fire Department (LACFD) would provide emergency response services to the project site. The proposed site plans, including the access driveways, would be reviewed and approved by the LACFD during plan check review. Adherence to LACFD requirements would reduce potential impacts related to emergency plans to **less than significant**. No mitigation is required.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Less Than Significant Impact. The project site is located within an urban setting, generally surrounded by a commercial development. The nearest wildland areas are located at the bottom of the San Gabriel Mountains, approximately four miles north of the project site, and the Covina Hills, approximately two miles south of the project site. In the unlikely event of a fire emergency at the project site due to wildland fires, the LACFD, specifically Fire Station 154 (401 North Second Avenue), Fire Station 153 (1577 East Cypress Street), and Fire Station 152 (807 West Cypress Street), all located in Covina,

would provide fire protection services. Implementation of the proposed project is not likely to expose people or structures to a significant risk of loss, injury, or death involving wildland fires due to the intervening distance and urban development that lays between the project site and wildland areas. As such, impacts would be **less than significant**. No mitigation is required.

References

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3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

Less Than Significant Impact. A significant impact would occur if the proposed project would discharge water that did not meet the water quality standards established by the State Water Resources Control Board (SWRCB) National Pollution Discharge Elimination System (NPDES) and waste discharge requirement (WDR) permit programs, and the Los Angeles Regional Water Quality Control Board's (RWQCB) Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan; RWQCB 2019). The proposed project is not anticipated to violate any water quality standard or waste discharge requirement during construction and operation, for the reasons described below.

Construction

During construction of the proposed project, stormwater runoff could potentially violate applicable water quality standards by introducing pollutants to stormwater runoff. Construction activities could adversely affect water quality through land disturbances (such as pavement removal, compaction, grading, and temporary soil stockpiling), which could potentially increase sediment loads in stormwater runoff by eroding soils newly loosened or exposed by construction activity. Additionally, construction activities could adversely affect water quality through accidental spills or leaks of pollutants, including diesel fuel, gasoline, lubrication oil, cement slurry, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and construction-related trash and debris. The amount of such materials used during construction would be the minimum necessary to fuel vehicles, power equipment, and complete activities. Improper management of hazardous materials could result in accidental spills or leaks, which could locally contaminate stormwater runoff.

The potential water quality impacts associated with project construction, as described above, would be temporary and highly localized. Because land disturbances associated with the proposed project would be greater than one acre in size, the applicant would be required to submit a Notice of Intent to the SWRCB in order to obtain approval to carry out construction activities under the Construction General Permit (SWRCB Order No. 2009-009-DWQ, as amended). This permit includes a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction-phase impacts related to stormwater (and some non-stormwater) discharges. Compliance with the Construction General Permit requires that a SWPPP be developed and implemented by qualified individuals, as defined by the SWRCB. Additionally, construction activities would be subject to compliance with Municipal Code Section 8.50.100, which outlines mandatory requirements for implementation of an erosion and sediment control plan. In accordance with Section 8.50.100, the applicant would be required to prepare, submit, and

comply with an erosion and sediment control plan. Erosion and sediment controls plans are required by the City to include all elements of a SWPPP and BMPs designed to control erosion and sediment and to manage waste and non-stormwater in accordance with applicable waste discharge requirements for the municipal separate storm sewer system. Examples of such BMPs that may be required by the erosion and sediment control plan could include sandbag barriers, dust controls, perimeter controls, drain inlet protection, and proper construction site housekeeping practices.

The proposed project could also adversely impact water quality through non-stormwater runoff during construction, for example, through dewatering activities that inadvertently add groundwater that could have pollutants to the storm drain system. According to the geotechnical report prepared for the project, groundwater was not encountered during exploratory soil borings at the site (which extended to depths of approximately 50 feet below ground surface (bgs)). Depth to groundwater on the project site is estimated to be between 100 bgs to 300 bgs (Appendix D and Appendix E). Given that the proposed project would include excavation to a depth of approximately 15 feet, project construction is not anticipated to encounter groundwater and, as such, is not anticipated to entail dewatering. Additionally, the proposed project would not include the installation of any groundwater wells. For these reasons, the proposed project construction is not expected to affect groundwater quality.

In summary, compliance with the Construction General Permit and local regulations for proper management of construction sites would prevent construction activities associated with the proposed project from having substantial adverse impacts on surface or groundwater water quality. Construction impacts would be less than significant.

Operation

Under existing conditions, runoff from the project site drains southwest towards 3rd Avenue and San Bernardino Road at a gradient of 1.5%, before draining into the City's storm drain system. The project site is currently developed with surface parking lots, an abandoned automobile paint and body shop, a vehicle/equipment storage yard and a single-story, metal shed and a yard that is being utilized to store equipment. Under the proposed project, the site would be developed with a mixed-use building, residential structures, a multi-level parking garage, surface parking, and landscaping. Under existing conditions, the project site is 94% impervious. Due to the introduction of new landscaped areas to the project site, the project site would be 80% impervious upon project implementation. Additionally, the Hydrology Report (Appendix F) prepared for the project shows that project operation would result in a slight decrease in stormwater flow to the storm drain system.

While the project site currently supports surface parking lots and several buildings, parking for the proposed project would primarily be provided in a covered, multi-level parking structure. Given this, the potential for stormwater runoff to contain pollutants typical of parking lots, such as spilled or leaked petroleum products, trash, and sediment would decrease when compared to existing conditions. Conversely, the addition of landscaping on the project site could introduce an additional source of pesticides, fertilizers, and sediments, which are considered water pollutants. During operation, the proposed project would be subject to standards and regulations pertaining to stormwater runoff and municipal separate stormwater sewer system (MS4) discharges. These standards and regulations, which are summarized in the paragraph below, would reduce the potential effects of project operation.

Local requirements for water quality and stormwater runoff are set forth in Municipal Code Chapter 8.50 (Stormwater Quality and Urban Runoff Control). Specific sections that would address the potential effects of project operation include Section 8.50.060 (Best Management Practices and Permits Authorized and Required) and Section 8.50.120 (Low Impact Development). Section 8.50.060 sets forth requirements for BMPs including prohibition of leaks, spills, or discharge of oil, grease, coolant, or other hazardous material onto any street, alley, road, parking area, or surface in the City, where such pollutants could enter the MS4 or any receiving water. Section 8.50.120 requires the project to be designed in accordance with the current Los Angeles Municipal NPDES permit, which is the “Waste Discharge Requirements for MS4 Discharges within the Coastal Watersheds of Los Angeles County, except Those Discharges Originating from the City of Long Beach MS4” (Order No. R4-2012-0175, NPDES No. CAS004001), issued by the Los Angeles RWQCB, and any amendments or successor permit to that permit. In accordance with this permit and Municipal Code Section 8.50.120, the project applicant has prepared a Low Impact Development (LID) Plan to demonstrate project compliance with required performance criterion set forth in Section 8.50.120(E). The overarching performance criterion is that the projects are required to retain 100% of the “Stormwater Quality Design Volume” on site. If compliance with the 100% retention requirement is technically infeasible, partially or fully, infeasibility must be demonstrated in a LID Plan and the remaining stormwater must be biofiltered. The remaining stormwater quality design volume that cannot be retained or biofiltered must be treated on site to reduce pollutant loading, as outlined in Section 8.50.120(E)(3)(d).

The LID Plan (Appendix F) outlines several BMPs that would minimize runoff, further reduce the project site’s impervious footprint, and minimize directly connected impervious surfaces. These BMPs include, but are not limited to, the implementation of drain inserts, infiltration trenches, efficient landscaping irrigation systems, and drainage facility inspection and maintenance protocol during operation. The on-site soil conditions of the project site would not allow for stormwater infiltration. In lieu of infiltration, the LID Plan proposes implementation of a proprietary filter system, which would simulate a natural bio-filtration process and would treat storm water from the project site. Roof runoff from the proposed buildings would drain to landscaped areas where it would enter an area drain system, which would tie into an existing 48-inch storm drain within San Bernardino Road. The paved streets and driveways of the proposed project would drain into catch basins that would ultimately drain to the proposed underground infiltration chambers. Compliance with Municipal Code Section 8.50.120 and implementation of the proposed project’s LID Plan would reduce the peak volume of stormwater runoff discharged into the MS4, as well as the potential for pollutants to enter the MS4. As such, impacts related to the water quality standards and waste discharge requirements would be **less than significant** during construction and operation. No mitigation is required.

b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less Than Significant Impact. A project would have the potential to deplete groundwater supplies if it would result in increased water usage from groundwater sources to the extent that such sources would be compromised. The project could also have an adverse effect on groundwater if it would prevent water from infiltrating into the ground and replenishing groundwater supplies.

The proposed project would connect to municipal water service provided by the Water Utility Division of the City’s Public Works Department. The primary water provider for the City is the Covina Irrigating Company, which obtains water from the Main San Gabriel Groundwater Basin and from the San Gabriel River (City of Covina 2017). As such, a portion of the City’s water supply is sourced from groundwater, and, as such,

water supply to the project site may be sourced from groundwater supplies. According to the CalEEMod generation rates, proposed project operation is anticipated to require approximately 54,638 gallons of water per day. The estimated water consumption of the proposed project totals approximately 1% of the Water Utility Division's projected water supply for 2020 and 2025. Thus, the Water Utility Division would have sufficient supplies to serve the proposed project and reasonably foreseeable future development (subject to separate environmental approval) during years with normal precipitation. During periods of dry and multiple dry years, the City's ability to supply water from groundwater and treated surface water purchased from the Covina Irrigating Company would not be compromised (City of Covina 2015). Additionally, the project site would be redeveloped in compliance with the CALGreen (which implements water efficiency standards for appliances and fixtures) and would constitute a minor portion of the total groundwater supplies managed by the Covina Irrigating Company. As such, the proposed project would not substantially decrease groundwater supplies.

Additionally, the proposed project would not deplete or substantially interfere with the local groundwater table because no groundwater wells are proposed and because the proposed project would not substantially interfere with groundwater recharge. Under existing conditions, the project site is covered with impervious surfaces totaling 223,765 sf. As such, the project site does not support groundwater recharge activities under existing conditions. Under the proposed project, the project site's impervious surface would be reduced to 166,093 sf, which may slightly increase the infiltration of surface runoff. As such, the proposed project would not adversely affect groundwater recharge activities and would not decrease groundwater supplies such that the project would impede sustainable groundwater management of the Main San Gabriel Groundwater Basin. Impacts would be **less than significant**, and no mitigation is required.

c) ***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

i) ***result in substantial erosion or siltation on or off site;***

Less Than Significant Impact. No streams, rivers, wetlands, or other waterbodies are located on, or adjacent to, the project site. As such, the proposed project would not result in the alteration of the course of a stream or river. Construction of the proposed project would result in ground surface disruption during grading and excavation that could create the potential for erosion or siltation to occur on or off site. The applicant would be required to prepare and implement a SWPPP and an erosion and sediment control plan, as described in Section 3.10(a). These plans would include BMPs to minimize erosion, such as sandbag barriers, dust controls, perimeter controls, drain inlet protection, and proper construction site housekeeping practices. The plans would also include BMPs designed to manage waste and non-stormwater in accordance with applicable waste discharge requirements for the MS4. Implementation of these BMPs would minimize the amount of erosion and/or siltation that would have the potential to occur during construction and would ensure that construction impacts would be less than significant.

During operation, the project site would be covered with buildings, hardscaping, and landscaping, which would generally preclude on-site erosion and siltation. Additionally, the Hydrology Report (Appendix F) prepared for the project shows that project operation would result in a slight decrease in excess flow to the storm drain system, which would reduce the potential for off-site erosion and siltation. Any long-term changes in drainage patterns that would occur as a result of implementing the proposed project would be

minor, highly localized changes. For example, the construction of buildings on the project site could alter the direction or behavior of stormwater runoff in the immediate area. However, the project site as a whole would maintain the general existing drainage pattern, as the project site would remain generally level and urbanized. Due to the developed nature of the project site and required compliance with existing regulations described in Section 3.10(a), any alterations to the existing drainage pattern of the project site would result in a **less than significant** impact relative to erosion or siltation on or off the project site during operation. No mitigation is required.

- ii) ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

Less Than Significant Impact. As described under item 3.10(c)(i), no streams, rivers, wetlands, or other waterbodies are located on, or adjacent to, the project site. As such, the proposed project would not result in the alteration of the course of a stream or river. Construction of the proposed project would result in ground surface disruption during grading and excavation, temporarily altering the drainage pattern of the project site during construction. However, compliance with provisions of a SWPPP and an erosion and sediment control plan (specifically the use of run-off control devices) would ensure that flooding on- or off-site is minimized during construction, to the extent practicable. Standard construction control procedures that would be set forth in the project's SWPPP and erosion and sediment control plan would ensure that construction impacts are less than significant.

During operation, the project site would be covered with buildings, hardscaping, and landscaping. The Hydrology Report (Appendix F) prepared for the project shows that project operation would result in a slight decrease in excess flow to the storm drain system. Any long-term changes in drainage patterns that would occur as a result of implementing the proposed project would be minor, highly localized changes. For example, the construction of buildings on the project site could alter the direction or behavior of stormwater runoff in the immediate area. However, the project site as a whole would maintain the general existing drainage pattern, as the project site would remain generally level and urbanized. Furthermore, pursuant to Municipal Code Section 8.50.120, the project applicant has prepared a LID Plan. Implementation of this plan would reduce stormwater runoff from the project site, thereby reducing the potential for flooding on- and off-site. Due to the existing and proposed impervious nature of the project site (See Section 3.10(b)) and required compliance with existing regulations, any minor alterations to the existing drainage pattern of the project site would result in **less than significant** impacts relative to flooding on- or off-site. No mitigation is required.

- iii) ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***

Less Than Significant Impact. During construction of the proposed project, drainage patterns and runoff quantities on the project site may be temporarily altered due to increased pervious surfaces as a result of grading and excavation activities. Implementation of the required project-specific SWPPP and erosion and sediment control plan (specifically, the use of runoff-control devices) would ensure that runoff quantities are managed and reduced, thereby avoiding overwhelm of the existing stormwater drainage system. Additionally, the SWPPP and erosion and sediment control plan would contain project-specific BMPs that would prevent pollutants from entering the storm drain system. Implementation of BMPs for runoff management and pollution control would ensure that construction impacts would be less than significant.

Development of the project site largely involves replacement of existing impervious surfaces with new buildings, hardscaping, and landscaping; however, project implementation would result in a 57,670-square-foot increase in impervious surface area at the project site, which may result in increased stormwater infiltration on-site. The Hydrology Report (Appendix F) prepared for the project shows that project operation would result in a slight decrease in excess flow to the storm drain system. The project applicant has prepared a LID Plan, which would ensure that stormwater is retained on the project site to the extent feasible and that any effects to stormwater quality are minimized. Due to the minor changes in drainage patterns that are proposed, as well as compliance with applicable stormwater regulations, the proposed project would result in a **less than significant** impact to the stormwater drainage system and to stormwater quality. No mitigation is required.

iv) impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Map Service, the project site is located in Zone X. Zone X is considered an area of minimal flood hazard (FEMA 2008). The project site is not located within a dam or levee inundation area. The closest dam to the project site is the Santa Fe Dam and Recreation Area, which functions as a flood control dam for the San Gabriel River system. The dam lies three miles northwest of the site. As such, the project site has a low probability for flooding.

In the unlikely event of flooding, the proposed project would not impede or redirect flood flows when compared to existing conditions. As stated above in Sections 3.10(c)(ii) and 3.10(c)(iii), the proposed project would replace the existing hardscape and structures on the project site with a mixed-use building, multi-level parking garage, townhomes, and associated landscaping. The proposed project would result in similar amounts of pervious and impervious surfaces relative to existing conditions. The project would also maintain the general existing on-site drainage pattern of the site. Furthermore, the proposed project would be required to comply with Municipal Code Sections 8.50.100 and 8.50.120, which require preparation and implementation of an erosion and sediment control plan, a SWPPP, and a LID Plan. Implementation of these plans would ensure that stormwater is retained on the project site to the extent feasible and that flooding on- or off-site is minimized during construction and operation of the proposed project. The project site would remain generally level and urbanized and would not impede or redirect flood flows to an extent greater than under existing conditions. The proposed project would have a **less than significant** impact. No mitigation is required.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As stated above, the project site has been mapped within Zone X by FEMA. Zone X is an area with minimal risk of flooding (FEMA 2008). Seiches are earthquake-induced waves in enclosed bodies of water, such as lakes or reservoirs. The nearest enclosed body of water is the Santa Fe Dam and Recreation Area, located 3 miles northwest of the project site. Additionally, Puddingstone Reservoir and Dam complex is located approximately 4.5 miles east of the project site. The City has identified seiches as a potential hazard that could occur in the community due to the proximity of the City to the Puddingstone Reservoir and Dam complex. While a catastrophic earthquake event and associated seiche could pose a hazard to the project site, inundation of the site is not anticipated due to the intervening distance between the project site and the two nearest enclosed water bodies (Santa Fe Dam and Recreation Area and Puddingstone Reservoir and Dam complex).

A tsunami is a sea wave generated by an underwater seismic disturbance, such as sudden faulting or landslide activity. The project site is not located near any coastal areas. The project site is located approximately 33 miles inland from the Pacific Ocean, at an elevation of around 550 feet above mean sea level. The risk of a tsunami affecting the project site is low.

In the unlikely event of flooding or inundation at the project site, the proposed project would not risk the release pollutants. The proposed project includes the construction of a mixed-use building, 161 townhomes, parking areas, and associated landscaping. These land uses are not typically associated with the storage of highly toxic hazardous materials or chemicals that would risk the release of pollutants into the environment in the unlikely event of project inundation. As such, given the distance between the project site and the nearest water bodies, and given the proposed land uses at the project site, the proposed project would have a **less than significant** impact pertaining to the release of pollutants due to project inundation. No mitigation is required.

e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. The proposed project would comply with regional and local regulations for water quality control and would not obstruct existing water quality control plans. The City requires hydrology and stormwater discharge review during the City's standard development review process and would ensure there is no conflict with existing water quality control plans. Additionally, as discussed in Section 3.10(b), the proposed project would not deplete or substantially interfere with the local groundwater table because no groundwater wells are proposed and because the proposed project would not substantially interfere with groundwater recharge. (Under existing conditions, the project site is covered with impervious surfaces. As such, the project site does not support groundwater recharge activities under existing conditions.) Under the proposed project, the project site would remain primarily impervious. The proposed project would have a less than significant impact relative to groundwater use and groundwater quality and, as such, would not conflict with any plans pertaining to groundwater management. Therefore, impacts associated with a water quality control plan or sustainable groundwater management plan would be **less than significant**. No mitigation is required.

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3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project physically divide an established community?

No Impact. The proposed project would involve the redevelopment of existing vacant lots within the downtown area of the City. The project site is surrounded by commercial land uses to the east, vacant lots to the south across San Bernardino Road, and single/multi-family residential uses to the west and north. The proposed mixed-use project, which includes 161 townhomes; 13,500 sf of retail space; 3,800 sf of restaurant space; 46,679 sf of outdoor area, and a multi-level parking garage, would be consistent with surrounding land uses. The proposed project would not include any new roads, infrastructure, or buildings, the construction of which would inhibit access to an existing neighborhood or physically divide an existing neighborhood within the City, nor would the project impede access between neighborhoods and other areas of the City by creating physical barriers.

The proposed project would represent a change in building height on the project site relative to existing uses, as described in Section 3.1. However, the proposed heights would range from 36 feet to 50 feet (three to four stories) and would be generally consistent with other development in the vicinity, which generally ranges from one to three stories. Furthermore, the proposed project would not involve features such as highways, aboveground infrastructure, or easements through an established neighborhood. As such, the proposed project would not physically divide an established community, and **no impact** would occur.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact. Land use plans and policies applicable to the proposed project are set forth in the City's General Plan, Zoning Ordinance, and the TCSP. The project site is zoned TCSP-4 (Mixed-Use Focused Activity Area).

The TCSP identifies the project site as an "especially well-suited [development] opportunity site due to large areas of common ownership, and proximity to both the downtown and the Metrolink commuter transit stop" (City of Covina 2004). The TCSP establishes a maximum building height of 50 feet for new development within the planning area that comprises at least 30% residential development (City of Covina 2004). The proposed project would develop an approximately 230,868-square foot project site with a mixed-use building that would 50 feet in height and comprised predominantly of townhomes. As such, the proposed mixed-use building would be consistent with the land use height restrictions established in the TCSP, as would the eight townhome buildings, which would be a maximum of 36 feet in height.

The TCSP-4 zone does not assume any particular predominant land use; rather, it provides the opportunity to develop and redevelop property within key development opportunity areas with a finely grained mixing of land uses. The Mixed-Use Focused Activity Area is intended for retail, light industrial, cultural, and entertainment uses, as well as residential development, with an emphasis on the mixing of uses on properties, within buildings, and within blocks, as compatibility allows. The Mixed-Use Focused Activity Area provides the opportunity to mix residential uses on upper floors with retail, office, or other appropriate uses at the ground level or second level for multi-story development projects. The Mixed-Use Focused Activity Area also provides the opportunity to mix commercial land uses of different types (City of Covina 2004). The proposed project would involve a mix of residential and commercial uses on the site and, therefore, would comply with the overall intent of for the Mixed-Use Focused Activity Area. However, the proposed project includes several residential-only structures. Single-use development projects are allowed in the TCSP-4 zone upon City review and approval (City of Covina 2004). As such, with the City's approval of the proposed project, the proposed project would be in conformance with the TCSP-4 designation.

The project site is designated Town Center Commercial in the City's General Plan. Permitted uses under the Town Center Commercial land use designation consist of specialized retail and service businesses that complement the unique character and serve the patrons of downtown Covina and that comply with applicable use, operation, and other provisions of the Zoning Ordinance. Vibrant, economically viable commercial businesses that operate during both daytime and nighttime hours are envisioned on and adjacent to Citrus Avenue. More specifically, permitted uses include but are not limited to automotive sales; limited automotive repair shops; administrative, professional, and governmental offices; institutional uses; utility facilities; and commercial/residential mixed uses, when the residential portion is located above the first floor, consists of single-room occupancy or apartment-type units, and conforms to applicable mixed-use standards and provisions. The proposed project includes several residential-only structures, and the mixed-use building has some residential uses planned for the first floor. Single-use development projects would be allowed on the project site upon City review and approval of the project (City of Covina 2004). As such, with the City's approval of the proposed project, the proposed project would be in conformance with the Town Center Commercial designation. Furthermore, it is noted that residential units on upper floors is not a policy that pertains to avoiding or mitigating an environmental impact but is related, rather, to urban design and the overall planning vision outlined for the Town Center Commercial zone.

For these reasons, the proposed project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. Impacts would be **less than significant**, and no mitigation is required.

References

City of Covina. 2004. *Covina Town Center Specific Plan*. Final. Accessed April 12, 2019. https://covina.ca.gov/sites/default/files/fileattachments/planning_commission/page/1074/towncenterspecificplanfinal.pdf.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells located within the project area (DOGGR 2019). As such, the proposed project would not have the potential to interfere with extraction of oil, gas, or geothermal resources.

The project site is located within the San Gabriel Production-Consumption Region for Portland Cement Concrete-grade aggregate resources, as mapped by the Division of Mines and Geology (renamed the California Geological Survey in 2006; DOC 2010). The Division of Mines and Geology has mapped the project site within Mineral Resource Zone 3 for aggregate resources. Mineral Resource Zone 3 is a designation given to “areas containing mineral deposits the significance of which cannot be evaluated from available data” (Division of Mines and Geology 1982). The proposed project is located in an urbanized area and does not support any mineral extraction activities. Due to the urbanized nature of the project site and its surroundings, as well as the absence of known, significant mineral resources as mapped by the state, project implementation is not anticipated to result in loss of availability of a known mineral resource of value to the region and residents of the state. **No impact** to state or regionally important mineral resources would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The General Plan states that there are no mining activities within the City and states that none are expected to occur in the future because of the City's built-out nature, land use restrictions, and the potential for land use conflicts such as noise and dust. Furthermore, the Zoning Ordinance prohibits the extraction or production of aggregates. The General Plan discusses two sites in the northern portion of the City that were identified by the state as potentially containing mineral deposits. However, the state declared these areas insignificant due to urbanization and potentially negative incursions that would preclude extraction (City of Covina 2000). The proposed project site is not located in the northern portion of the City. The City has not identified any locally important mineral resource recovery sites and in fact prohibits such activities within its jurisdiction. For these reasons, implementation of the proposed project would not result in the loss of availability of a known locally important mineral resource. As such, **no impact** to availability of locally important mineral resources would occur.

References

DOC (California Department of Conservation). 2010. *Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley*. Accessed, April 12, 2019.
ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/SR_209_Text.pdf.

City of Covina. 2000. *City of Covina General Plan*. Adopted April 2000. Accessed April 12, 2019.
<http://www.covina.ca.gov/city-departments/community-development/planning>.

Division of Mines and Geology. 1982. Mineral Land Classification Map – Aggregate Resources Only. Baldwin Park Quadrangle. June 1, 1982. Accessed April 12, 2019. <http://www.quake.ca.gov/gmaps/WH/smaramaps.htm>.

DOGGR (Division of Oil, Gas, and Geothermal Resources). 2019. DOGGR Well Finder. Accessed April 12, 2019.
<https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.88989/34.09255/16>.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise Characteristics

Sound may be described in terms of level or amplitude (measured in decibels (dB)), frequency or pitch (measured in hertz (Hz) or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level (L_n), the day-night average noise level (L_{dn}), and the community noise equivalent level (CNEL). Each of these descriptors uses units of dBA.

L_{eq} is a sound energy level averaged over a specified time period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors. L_{max} is the greatest sound level measured during a designated time interval or event.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). "Time weighted" refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 to 1 dB.

Existing Noise Conditions

Currently, the project site is occupied by vacant automotive service/sales uses, with a combined area of 5.3 acres. All existing buildings and surface parking lots would be removed in order to accommodate the proposed development. The project site and the surrounding area are primarily subject to traffic noise associated with adjacent roadways including Citrus Avenue and San Bernardino Road.

Noise measurements were conducted on and near the project site in June 2016 and in October 2018 to characterize the existing noise levels. Table 3.12-1, provides the location, date, and time the noise measurements were taken. The noise measurements were taken using a Piccolo Integrating Sound Level Meter (Serial Number 130625008) equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Use) sound level meter. The sound level meter was calibrated before and after the measurements, and the measurements were conducted with the microphone positioned approximately five feet above the ground.

Nine noise measurement locations that represent key existing or proposed sensitive receivers were selected, in coordination with the City, adjacent to or near the project site. These locations are depicted as Receivers 1–9 (M1–M9) on Figure 3.13-1. Location M1 was located on the site of an approved but not yet built multi-family residential structure, north of Orange Street and south of San Bernardino Road; M2 was located at single-family residences south of Orange Street; M3 was located east of Citrus Avenue at a mixed-use townhome development; M4 was located at Civic Center Park; M5 was located at an approved but not yet built mixed-use development (retail and commercial uses); M6 was located at the Covina Assembly of God Church; M7 was located on the project site, adjacent to San Bernardino Road; M8 was on the project site, adjacent to the corner of San Bernardino Road and Citrus Avenue; and M9 was located at multi-family residential uses west of 3rd Avenue, west of the project site. The measured energy-averaged (L_{eq}) and maximum (L_{max}) noise levels and measurement locations are provided in Table 3.12-1. The primary noise source at the sites identified in Table 3.12-1 was the traffic along adjacent roadways. As shown in Table 3.12-1, the measured sound levels ranged from approximately 52 dBA L_{eq} at M2 to 70 dBA L_{eq} at M7.

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SOURCE: USDA 2016

FIGURE 3.13-1
Noise Measurement and Modeling Locations
Covina Hassen Development Project (Site A)

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Table 3.13-1. Measured Noise Levels

Receptors	Location	Date	Time	L _{eq} (dBA)	L _{max} (dBA)
M1	Approved multi-family residential development	June 16, 2016	1:30 p.m. – 1:45 p.m.	63.1	75.5
M2	Single-family residential	June 16, 2016	9:51 a.m. – 10:06 a.m.	52.3	68.1
M3	Multi-family residential	June 16, 2016	1:06 p.m. – 1:16 p.m.	63.8	76.4
M4	Civic Center Park	June 16, 2016	10:12 a.m. – 10:27 p.m.	60.5	70.1
M5	Approved mixed-use development	June 16, 2016	12:48 p.m. – 12:58 p.m.	52.6	63
M6	Covina Assembly of God Church	June 16, 2016	10:44 a.m. – 10:59 a.m.	62.3	74.2
M7	On the project site, north of San Bernardino Road	October 2, 2018	10:24 a.m. – 10:39 a.m.	70.0	80.6
M8	On the project site, adjacent to San Bernardino Road and Citrus Avenue	October 2, 2018	10:45 a.m. – 11:00 a.m.	66.5	85.8
M9	Multi-family residential uses west of 3rd Avenue, west of project site	October 2, 2018	11:06 a.m. – 11:21 a.m.	62.7	81.6

Source: Appendix G

Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include the following:

- Multi-family residential land uses (the Vintage Walk multi-family condominium development), located to the west of the project site across 3rd Avenue.
- Approved multi-family and existing single-family residential land uses located to the south and east of the project site, across San Bernardino Road.
- Civic Center Park, located to the southeast of the project site.

The above sensitive receptors represent the nearest land uses with the potential to be impacted by construction and operation of the proposed project. Additional sensitive receptors are located farther from the project site in the surrounding community and would be less impacted by noise and vibration levels than the above-listed sensitive receptors. In addition to the off-site receptors listed above, the residential uses to be constructed as part of the proposed project are considered sensitive receptors.

- a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Less Than Significant with Mitigation Incorporated. On-site noise-generating activities associated with the proposed project would include short-term construction as well as the long-term operational noise of the proposed project. The proposed project would also generate off-site traffic noise along various roadways in the area. In addition, the proposed uses on the project site would be subject to traffic noise from San Bernardino Avenue, Citrus Avenue, and 3rd Avenue. These potential effects are analyzed below.

Construction Noise (Short-Term Impacts)

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor.

Construction of the overall proposed project is anticipated to take approximately 20 months, beginning in fall 2019. Construction of the proposed project would include demolition, site preparation, grading, building construction and trenching, paving, and application of architectural coatings. Additional construction details are provided in Table 3.3-2, in Section 3.3 of this IS/MND.

Equipment that would be in operation during construction would include graders, backhoes, loaders, forklifts, compressors, welders, and paving equipment. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 3.13-2 below. Note that the equipment noise levels presented in Table 3.13-2 are maximum noise levels. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3.13-2. Construction Equipment Maximum Noise Levels

Equipment Type	“Typical” Equipment dBA at 50 feet	“Quiet” Equipment* dBA at 50 feet
Air compressor	81	71
Backhoe	85	80
Concrete pump	82	80
Concrete vibrator	76	70
Crane	83	75
Truck	88	80
Dozer	87	83
Generator	78	71
Loader	84	80
Paver	88	80
Pneumatic tools	85	75
Water pump	76	71
Power hand saw	78	70

Table 3.13-2. Construction Equipment Maximum Noise Levels

Equipment Type	"Typical" Equipment dBA at 50 feet	"Quiet" Equipment* dBA at 50 feet
Shovel	82	80
Trucks	88	83

Source: DOT 2006

* Estimated levels obtainable by selecting quieter procedures or machines and implementing noise-control features requiring no major redesign or extreme cost.

The maximum noise levels at 50 feet for typical construction equipment would be 88 dB for the equipment typically used for this type of development project, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance. Project construction would take place both near and far from adjacent, existing noise-sensitive uses. For example, construction within some portions of the project site would take place approximately 60 feet from existing residences, but during construction of other project components, construction would be several hundred feet away from noise sensitive receptors and likely shielded from direct view. Most construction activities associated with the proposed project would occur at distances of approximately 200 feet or more from existing noise-sensitive uses.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use (although the model was funded and promulgated by the FHWA, the RCNM is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction). Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. No topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Using the FHWA's RCNM construction noise model and construction information (types and number of construction equipment by phase), the estimated noise levels from construction were calculated for a representative range of distances, as presented in Table 3.13-3 below. The RCNM inputs and outputs are provided in Appendix G.

Table 3.13-3. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (dBA L _{eq})	
	<i>Nearest Construction Work (approximately 60 feet from sensitive receptors)</i>	<i>Typical Construction Work (approximately 200 feet from sensitive receptors)</i>
Demolition	81	71
Grading	83	73
Building Construction	80	71
Paving	83	73
Architectural Coating	72	62

Source: Appendix G

Notes: L_{eq} = equivalent continuous sound level

As presented in Table 3.13-3, the highest noise levels are predicted to occur during grading activities when noise levels from construction activities would be as high as 83 dBA L_{eq} at the nearest existing residences, approximately 60 feet away. At more typical distances of approximately 200 feet, construction noise would range from approximately 62 to 73 dBA L_{eq} .

According to Section 9.40.110 of the City's Municipal Code, it is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance. Although nearby off-site residences would be exposed to elevated construction noise levels, the exposure would be short-term and would cease upon completion of project construction. Construction activities associated with the proposed project would take place between 7:00 a.m. and 8:00 p.m. and would not take place on Sundays or public holidays. Therefore, project construction would not violate the City's standards for construction noise. However, construction noise levels would be substantially higher than existing ambient daytime noise levels. Therefore, noise impacts from construction are considered to be potentially significant. The implementation of mitigation measures **MM-NOI-1** and **MM-NOI-2** would substantially reduce construction noise, reducing the effects to below a level of significance. Therefore, temporary construction-related noise impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-NOI-1 Construction activities shall take place during the permitted times and days per Chapter 9.40.110 of the City's Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 7 a.m. to 8 p.m. Monday through Saturday and shall not occur during other hours or on Sundays or public holidays. This condition shall be listed on the project's final design to the satisfaction of the City Engineering Department.

MM-NOI-2 The City of Covina shall require the applicant to adhere to the following measures as a condition of approving the grading permit:

- The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City Engineering Department.
- Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.

Operational Noise (Long-Term Impacts)

Long-term operational noise associated with the proposed project includes noise from the proposed residential units and commercial uses. Long-term operational noise also includes project-generated traffic and overall traffic noise at the project site. Each of these is addressed below, following a description of the City's regulations for noise-generating sources.

Noise-generating sources in the City are regulated under Chapter 9.40 of the City's Municipal Code. The noise limits apply to noise generation from one property to an adjacent property. The noise level limits depend on time of day, duration of the noise, and land use. The exterior noise level limits are depicted in Table 3.13-4. The noise levels in this table are used to determine long-term operational noise impacts associated with on-site activities.

Table 3.13-4. Exterior Noise Level Limits (Stationary Noise Sources)

Receiving Land Use Category	Time	Sound Level (A-Weighted Decibels)
Residential estate or agricultural	7:00 a.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	40
Residential low density	7:00 a.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	45
Residential medium and high density	7:00 a.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 10:00 p.m.	65
	10:00 p.m. to 7:00 a.m.	55
Industrial	7:00 a.m. to 10:00 p.m.	70
	10:00 p.m. to 7:00 a.m.	60

Source: City of Covina Municipal Code. Residential Units and Commercial Uses.

On-Site Stationary Noise

The project site, located north of San Bernardino Road between Citrus Avenue and 3rd Avenue, would be developed with 161 townhome units, 13,500 sf of retail space, 3,800 sf of restaurant space, 46,679 sf of outdoor area, and a multi-level parking garage. These uses would be in keeping with the commercial and residential character of the neighboring land uses, and no external noise sources are planned or proposed, save for HVAC equipment, suitably sized for the project, and an emergency generator.

The restaurant/retail and residential portions of the proposed project have the potential to generate noise from HVAC equipment. HVAC equipment located on the ground or on the rooftop of the buildings would have the potential to generate high noise levels. The specific details (location, size, manufacturer, and model) of the equipment have not yet been determined. Noise levels generated by HVAC equipment vary, but typically range from approximately 50 dBA to 65 dBA at a distance of 50 feet (City of Santa Ana 2010).

For a single point source such as a piece of mechanical equipment, the sound level normally decreases by approximately 6 dBA for each doubling of distance from the source under "hard-surface" conditions typical of a developed commercial site. HVAC noise levels have the potential to exceed the City's noise standard (45 dBA L_{eq} nighttime) for stationary-source noise at the low-density residential uses to the south, if the HVAC units are located within approximately 500 feet of the residences, with a clear line-of-sight between the source and receiver. HVAC noise levels have the potential to exceed the City's noise standard (50 dBA L_{eq} nighttime) at the medium-density residential uses to the west and at the proposed on-site medium-density residential uses, if the HVAC units are

within 350 feet of the receivers. The details regarding the potential inclusion of an emergency generator (as part of the restaurant / commercial component located within the mixed-use building) have not yet been developed.

As described above, operation of the proposed project would have the potential to exceed the City's noise standards. However, implementation of mitigation measure **MM-NOI-3** would reduce noise impacts from HVAC equipment and the emergency generator to a less than significant level. For these reasons, noise impacts from on-site stationary noise sources during operation are considered **less than significant with mitigation incorporated**. No further mitigation is required.

MM-NOI-3 Because heating, ventilation, and air conditioning (HVAC) equipment and other mechanical equipment (such as an emergency generator) can generate noise that could affect sensitive receptors and because the details, specifications, and locations of this equipment is not yet known, the project applicant shall retain an acoustical specialist to review project construction-level plans to ensure that the equipment specifications and plans for HVAC and other outdoor mechanical equipment incorporate measures, such as the specification of quieter equipment or provision of acoustical enclosures, that will not exceed relevant noise standards at nearby noise-sensitive land uses (e.g., residential). Prior to the commencement of construction, the acoustical specialist shall certify in writing to the City that the equipment specifications and plans incorporate measures that will achieve the relevant noise limits.

Off-Site Traffic Noise

The proposed project would generate traffic along adjacent arterial roadways (primarily Citrus Avenue and San Bernardino Road). The City does not have a specific criterion for evaluating the significance of project-related increases in off-site traffic noise levels at residences or noise-sensitive areas. For the purposes of this analysis, traffic noise level increases are considered significant if they exceed ambient traffic noise levels by 5 dB or more, or cause noise levels to exceed a 65 dBA L_{dn} noise threshold.⁹ An increase or decrease in noise level of 5 dBA is the minimum before any noticeable change in community response would be expected (Caltrans 2013). Therefore, a clearly perceptible increase (+5 dB) in noise exposure of sensitive receptors or a project-related exceedance of the 65 dBA L_{dn} noise threshold could be considered significant.

The noise levels associated with roadway traffic were determined based on the project's Traffic Impact Study (Appendix H) and using the Federal Highway Administration TNM 2.5 Traffic Noise Model version 2.5 (FHWA 2004). The results of the traffic modeling for the existing and existing plus project scenarios are summarized in Table 3.13-5 and the traffic noise model data files are attached to this document in Appendix G. As shown, the project-related traffic would result in a noise level increase of 1 dB L_{dn} or less along the studied roads in the vicinity of the project site. Increases would be below the significance threshold of 5 dB. Additionally, the proposed project would not result in an exceedance of the City's 65 dBA L_{dn} noise threshold. Therefore, traffic related to the proposed project would not substantially increase the existing noise levels in the project vicinity, and operational traffic-related noise impacts would be **less than significant**. No mitigation is required.

⁹ Policy Area C (1) (2) of the General Plan Noise Element (City of Covina 2000) requires that proposed residential or other noise-sensitive uses located within a 65 dBA L_{dn} noise contour attempt to mitigate the noise levels to ensure compatibility.

Table 3.13-5. Traffic Noise (Existing and Existing-with-Project)

Modeled Receptor	Existing Noise Level (dBA L _{dn})	Existing plus Project Noise Level (dBA L _{dn})	Noise Level Increase (dB)
M1 - Planned multi-family residential	57	57	0
M2 - Single-family residential	54	54	0
M3 - Multi-family residential	64	65	1
M4 - Civic Center Park	62	62	0
M5 - Planned retail / commercial	63	63	0
M6 - Covina Assembly of God Church	63	63	0
M7 - On-site, north of W. San Bernardino Road	67	67	0
M8 - On-site, adjacent to W. San Bernardino Road and N. Citrus Avenue	65	65	0
M9 - Multi-family residential uses west of N. 3rd Avenue, west of project site	58	58	0
R1 - Residential use west of Hollenbeck Avenue	63	63	0
R2 - Residential use west of 3rd Avenue	61	61	0
R3 - Residential use on Citrus Avenue, north of the project site	63	63	0
R4 - Residential use on Barranca Avenue, northeast of the project site	63	63	0
R5 - Residential use on Citrus Avenue, south of the project site	63	63	0

Note: "M#" receivers represent measured and modeled locations, whereas "R#" receivers represent modeled-only locations. Please refer to Figure 3.13-1.

Source: Appendix G

The noise level increases associated with additional traffic volumes under future (Year 2020) with project traffic conditions and future without project traffic conditions are summarized in Table 3.13-6. The noise level increases associated with the project under future traffic conditions would be 1 dB L_{dn} or less. As such, increases would be below the significance threshold of 5 dB. Additionally, the proposed project would not result in an exceedance of the City's 65 dBA L_{dn} noise threshold. Traffic noise would not be substantially increased as a result of the proposed project, and future operational traffic-related noise impacts would be **less than significant**. No mitigation is required.

Table 3.13-6. Traffic Noise (Future without Project and Future with Project)

Modeled Receptor	Future without Project Noise Level (dBA L _{dn})	Future with Project Noise Level (dBA L _{dn})	Noise Level Increase (dB)
M1 - Planned multi-family residential	57	58	1
M2 - Single-family residential	54	54	0
M3 - Multi-family residential	65	65	0
M4 - Civic Center Park	62	62	0
M5 - Planned retail / commercial	63	63	0

Table 3.13-6. Traffic Noise (Future without Project and Future with Project)

Modeled Receptor	Future without Project Noise Level (dBA L _{dn})	Future with Project Noise Level (dBA L _{dn})	Noise Level Increase (dB)
M6 - Covina Assembly of God Church	64	64	0
M7 - On-site, north of W. San Bernardino Road	67	67	0
M8 - On-site, adjacent to W. San Bernardino Road and N. Citrus Avenue	65	65	0
M9 - Multi-family residential uses west of N. 3rd Avenue, west of project site	59	59	0
R1 - Residential use west of Hollenbeck Avenue	64	64	0
R2 - Residential use west of 3rd Avenue	61	61	0
R3 - Residential use on Citrus Avenue, north of the project site	63	64	1
R4 - Residential use on Barranca Avenue, northeast of the project site	64	64	0
R5 - Residential use on Citrus Avenue, south of the project site	64	64	0

Source: Appendix G

On-Site Exterior Traffic Noise Levels

The results of the noise analysis for traffic noise levels at proposed on-site noise-sensitive receivers is provided in Table 3.13-7. On-site noise sensitive receiver locations (shown in Figure 3.13-1) consisted of the three upper levels of the proposed residential units within the mixed-use building, and the 2nd and 3rd levels of the proposed residential units within the residential-only buildings. Based upon information provided by the applicant, each of the residential units would have usable outdoor private spaces in the form of balconies.

Table 3.13-7. Summary of On-Site Future (Year 2020) Traffic Noise Levels (dBA L_{dn})

Modeled Receiver #	Floor Level of the Proposed Buildings		
	2nd Level	3rd Level	4th Level
R6 - On the project site, adjacent to Citrus Avenue	65	65	65
R7 - On the project site, adjacent to San Bernardino Road	65	65	65
R8 - On the project site, adjacent to 3rd Avenue	59	60	n/a

Source: Appendix G

Notes: Bolded numbers represent receiver locations exceeding 60 dBA L_{dn}; residential units at these locations will require subsequent interior noise analysis to verify compliance with the City and state's 45 dBA L_{dn} noise standard for habitable rooms.

As shown in Table 3.13-7, the results of the noise modeling indicate that on-site noise levels at the residential façade of the proposed townhomes would not exceed the City Noise/Land Use Compatibility noise standard for medium-density residential land uses of 65 dBA L_{dn}. Because the project's proposed balconies and patio areas would not exceed the 65 dBA L_{dn} noise standard, noise levels would be **less than**

significant; no mitigation is required for these exterior areas. However, as discussed below, the interior noise level criterion may be exceeded at some locations within the project site.

On-Site Interior Traffic Noise Levels

The City and the state require that interior noise levels not exceed a CNEL or L_{dn} of 45 dBA within the habitable rooms of residences. Typically, with the windows open, building shells provide approximately 15 dB of noise reduction. Therefore, rooms exposed to an exterior L_{dn} greater than 60 dBA could result in an interior L_{dn} greater than 45 dB. The State Building Code recognizes this relationship and, therefore, requires interior noise studies when the exterior noise level is projected to exceed 60 dBA L_{dn} .

The data shown in Table 3.13-7 above indicates that the future noise levels would range up to 65 dBA L_{dn} at the facades of the proposed residences fronting on San Bernardino Road and Citrus Avenue. The unmitigated interior noise levels within the habitable rooms of these dwelling units could exceed the 45 dBA L_{dn} noise criterion. A subsequent interior noise analysis will be required for these units. With the implementation of mitigation measure **MM-NOI-4**, the resultant noise level would meet the state and City interior noise standard of 45 dBA L_{dn} , and thus, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-NOI-4 An interior noise analysis shall be conducted by the project applicant for the proposed dwelling units along San Bernardino Road and along Citrus Avenue prior to issuance of building permits. Installation of mechanical ventilation systems or air conditioning systems and sound-rated windows shall be required if the interior noise analysis shows that impacts are above the state and City's 45 dBA L_{dn} interior standard. The interior noise analysis shall substantiate that the resulting interior noise levels will be less than the noise standard.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. Ground-borne vibration information related to construction activities has been collected by the California Department of Transportation (Caltrans 2004). Information from Caltrans indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inch/second begin to annoy people. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inch/second or less at a distance of 25 feet (DOT 2006). Ground-borne vibration is typically attenuated over short distances. At the distance from the nearest residence to the construction area (approximately 60 feet) and with the anticipated construction equipment, the peak particle velocity would be approximately 0.024 inch/second. This vibration level would exceed the City of Covina's vibration threshold of perceptibility of 0.01 inch/second. Vibration is very subjective, and some people may be annoyed at continuous vibration levels near the level of perception (or approximately a peak particle velocity of 0.01 inch/second). Although construction activities would not use construction equipment that would result in continuous vibration levels that typically annoy people, since some residences are as near as 60 feet from the construction area, residents could be temporarily annoyed with the use of some construction equipment. Implementation of mitigation measure **MM-NOI-2** would ensure residents are notified of construction activities and provided contact information in the event they wish to report a noise- or vibration-related complaint.

Building damage can also result from construction vibration. However, construction vibration from the proposed project would not result in structural building damage, which typically occurs at vibration levels

of 0.5 inch/second or greater for buildings of reinforced-concrete, steel, or timber construction. As stated above, the peak particle velocity anticipated during proposed project construction would be approximately 0.024 inch/second. The heavier pieces of construction equipment used for the project would include excavators, graders, dump trucks, and vendor trucks. Pile driving, blasting, or other special construction techniques would not be used for construction of the proposed project; therefore, excessive ground-borne vibration and ground-borne noise would not be generated. Ground-borne vibration would not be associated with the proposed project during operation. Impacts related to ground-borne vibration are therefore considered **less than significant with mitigation incorporated**. No further mitigation is required.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The project is located approximately six miles east of Brackett Field Airport. The project is not located within the planning area for this airport, nor is it located within two miles of this airport or any other airport (Airnav.com. 2019; Caltrans 2019; County of Los Angeles 2015). Therefore, the project would not expose people residing or working in the project area to excessive noise related to public airports. **No impact** would occur.

References

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- Caltrans (California Department of Transportation). 2019. California Aviation Facilities. Accessed May 9, 2019. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=966ebca3d4044e84bb352b98c5a62a35>.
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- Caltrans. 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. September 2013.
- County of Los Angeles. 2015. Brackett Field Airport Land Use Compatibility Plan. Prepared by Mead and Hunt for the Los Angeles County Airport Land Use Commission. Adopted December 9, 2015. Accessed November 27, 2018. <http://planning.lacounty.gov/aluc/airports>.
- City of Covina. 2000. City of Covina General Plan. Adopted April 2000. Accessed April 22, 2019. <http://www.covinaca.gov/city-departments/community-development/planning>.
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- FHWA (Federal Highway Administration). 2004. FHWA Traffic Noise Model Version 2.5.
- FHWA. 2008. Roadway Construction Noise Model (RCNM), Software Version 1.1. U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division. Washington, D.C. December 8, 2008.
- City of Santa Ana. 2010. City of Santa Ana Transit Zoning Code (SD 84A and SD 84B) Final Environmental Impact Report (SCH No. 2006071100).

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Less Than Significant Impact. The project would result in approximately 161 multi-family residential units and 17,300 sf of new commercial space. According to the U.S. Census Bureau, there are approximately 3.17 persons per household in the City (U.S. Census Bureau 2018). Assuming a maximum population generation scenario, whereby no existing residents move into the townhomes at buildout, the residential component of the proposed project would potentially result in the addition of 510 new residents to the City.

The estimated current population of the City is approximately 47,963 people (2018 population) (U.S. Census Bureau 2018). The additional 510 residents anticipated to result from development of the proposed project would represent an approximately 1% increase to the current City population.¹⁰ SCAG has projected that the City will have a population of 51,600 residents in 2040, which is approximately 20 years after anticipated project buildout (SCAG 2016). As such, it is expected that the City's population will grow by approximately 3,637 residents between the present time and 2040.¹¹ The proposed project would contribute to approximately 14% of this anticipated growth.¹² Due to the minor nature of the population growth that could result from the project relative to current conditions (1% over the current population) and because the growth falls well within the future projected population growth for the City, the population growth from the proposed project would not be considered substantial.

The proposed project would result in temporary and permanent increases in employment opportunities on the project site. Employment increases have the potential to cause population growth, as they may draw additional people and their households to the City. The temporary employment increases would be

¹⁰ $47,963 + 510 = 48,473$ residents (with project). $510/48,473 \times 100 = 1.05\%$

¹¹ $51,600$ residents in 2040 – $47,963$ residents in 2018 = $3,637$ residents

¹² 510 additional residents ÷ $3,637$ residents = $0.14 = 14\%$

associated with construction jobs available during the construction period. However, given the relatively common nature of the construction anticipated, the demand for construction employment would likely be met within the existing and future labor market in the City and in Los Angeles County. If construction workers live outside of the City, these workers would likely commute during the temporary construction period.

During operation, the proposed project would include 17,300 sf of commercial (retail and restaurant) space. Using the City of Los Angeles population growth projections of three people per 1,000 sf of retail uses, the commercial portion of the proposed project could generate approximately 52 people (City of Los Angeles 2006).¹³ Because the proposed project would be located in the densely populated Los Angeles metropolitan area, it is anticipated that the jobs available at the project site would be filled by City residents or by residents of neighboring cities who would commute to the project site. In the unlikely event that some of the new employees were to relocate to the City upon obtaining a job at the project site, this would result in minor to negligible population growth relative to the City's existing and future population. For the reasons described above, the proposed project would result in a **less than significant** impact relative to population growth. No mitigation is required.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. Under existing conditions, the project site contains vacant automotive service/sales uses. The project site does not currently support any housing or substantial employment that would have the potential to be displaced by development of the proposed project. As such, the project would not displace substantial numbers of people necessitating construction of housing elsewhere. **No impact** would occur.

References

- City of Los Angeles. 2006. L.A. CEQA Thresholds Guide. City of Los Angeles. http://environmentla.com/programs/table_of_contents.htm.
- SCAG (Southern California Association of Governments). 2016. Current Context – Demographics and Growth Forecast Appendix." *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. Adopted April 2016. Accessed April 19, 2019. http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf.
- U.S. Census Bureau. 2018. "QuickFacts – Covina City, California." Population Estimates as of July 1, 2018. Accessed April 19, 2019. <https://www.census.gov/quickfacts/table/PST045215/0616742,00>.

¹³ 17,300 sf ÷ 1,000 sf = 17.3 (*3 people) = 52 people

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Less Than Significant Impact. The City contracts with the LACFD to provide fire protection services and emergency response services. There are three fire stations within the City: Fire Station 154, located at 401 North Second Avenue; Fire Station 153, located at 1577 East Cypress Street; and Fire Station 152, located at 807 West Cypress Street. Fire Station 154, located approximately 0.2-mile from the project site, is closest to the project site and would be the first responder in case of emergency. Fire Station 154 has a three-person assessment engine (an engine company with some limited paramedic capabilities), which is staffed with one captain, one firefighter specialist, and one firefighter/paramedic. Fire Station 154 also has a two-person paramedic squad, with two firefighters/paramedics. The estimated emergency response time to the site is one to two minutes (Takeshita, pers. comm. 2019). In the event that Fire Station 154 could meet the immediate needs of a call for services independently, or did not have the capability to address the full extent of a larger incident, Fire Stations 153 and 152 or the closest available LACFD resources could respond or provide support.

As of April 2019, the LACFD does not have plans to expand facilities, staff, or equipment at Fire Stations 154, 153, and/or 152 (Takeshita, pers. comm. 2019). As discussed in Section 3.14, the proposed project would increase the land use intensity of the project site, resulting in approximately 510 residents on the site. The approximately 1% increase in City residents and employees would represent an incremental increase in demand for fire services within the City. However, the proposed project would be subject to current LACFD requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access, as well as fire code requirements. Compliance with the fire code standards would be ensured through the plan check process prior to the issuance of building permits and would reduce the potential demand for fire services at the project site. Furthermore, the LACFD confirmed that the proposed project would not have any significant effects to service demands, and the department does not foresee

any problems or impacts from implementation of the proposed project (Takeshita, pers. comm. 2019). Due to the limited increase in demand that would be attributable to the proposed project, the availability of fire services within proximity to the project site, and required compliance with fire code standards, the construction or expansion of existing fire facilities would not be required as a result of developing the proposed project. For these reasons, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities. Impacts resulting from the proposed project would be **less than significant**. No mitigation is required.

Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the City of Covina Police Department. The Covina Police Department is located at 444 North Citrus Avenue, which is located approximately 0.2-mile from the project site. The project site is in the department's Central Service Area (Covina Police Department 2019).

As discussed in Section 3.14, the proposed project would increase the land use intensity of the project site, resulting in approximately 510 residents on the site. The increased land use intensity at the project site could increase the frequency of emergency and non-emergency calls to the Covina Police Department from the project site compared to existing conditions.

The proposed project would employ defensible design, lighting, and landscaping, as well as open fencing for views of the site, and site design would minimize dead spaces hidden from public view to prevent loitering. These aspects of the project could lessen the demand for police protection services at the project site. Furthermore, police units are continuously mobile, and service calls are responded to by the nearest available mobile unit. Emergency calls typically have a response time of five minutes, and the proposed project site is located within close proximity to the Covina Police Station (Stabio pers. comm. 2019).

While new development may place increased demand on police protection services, the proposed project would not result in the construction or expansion of police facilities. The current staffing and facilities would be sufficient to serve the proposed project (Stabio pers. comm. 2019). As such, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities. Impacts resulting from the proposed project would be **less than significant**. No mitigation is required.

Schools?

Less Than Significant Impact. The project site is served by the Covina Valley Unified School District (CVUSD). The project site is within the attendance boundaries of the following schools: Workman Avenue Elementary School (1941 East Workman Avenue), Traweek Middle School (1941 East Rowland Avenue), and Covina High School (463 South Hollenbeck Avenue).

The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause new schools to be constructed. As described in Section 3.14, the proposed project would involve construction of 161 new residential units in the City. Using the state's Student Yield Factor for Unified School Districts, which is 0.7 students per dwelling unit (McEntire, pers. comm. 2019), the proposed project would result in approximately 113 children of school-attending age.¹⁴ While the proposed project would increase the number of students, it would not do so to the extent that new school facilities would be required.

¹⁴ 161 dwelling units * 0.7 students per dwelling unit = 112.7 students

The CVUSD has determined that the operational capacity of the school district would be sufficient to accommodate the proposed project. Some school facility retrofits and/or portable classrooms are currently being planned by CVUSD (McEntire, pers. comm. 2019). Additionally, the project applicant would be required to pay fees for both residential and commercial construction, pursuant to Education Code Section 17620 and California Government Code Section 65995. As stated in California Government Code Section 65996, payment of school impact fees in accordance with California Government Code Section 65995 and/or Education Code Section 17620 is deemed to constitute full and complete mitigation for potential impacts to schools caused by development. For these reasons, impacts related to the need for new school facilities as a result of implementing the proposed project would be **less than significant**. No mitigation is required.

Parks?

Less Than Significant Impact. The residents, employees, and customers of the proposed project could use nearby park facilities. Nearby recreation facilities include Cypress Park (eight acres, located 0.5-mile northwest of the project site), Edna Park (two acres, located 0.2 mile northwest of the project site), Kelby Park (six acres, located 0.55-mile northeast of the project site), Covina Park (10 acres, located 0.2-mile west of the project site), and Civic Center Park (1.5-acre, located less than 0.1-mile southeast of the project site). The City contains approximately 62 acres of parkland, comprised of nine parks and two ballparks. Additionally, the 11-acre Walnut Creek Park, which is owned by the County of Los Angeles, lies within the boundaries of the City. At the time of General Plan adoption in 2000, the City had 1.3 acres of open space for every 1,000 residents. This ratio is considered significantly below the National Park and Recreation Association's guideline of 2.5–4.0 acres of parkland for every 1,000 residents (City of Covina 2000). While the City is currently deficient in parkland acreage, implementation of the proposed project would not substantially exacerbate this issue. While the proposed project would incrementally increase the population in the City (by approximately one %), the amount of growth would be minor relative to the City's existing and future population (see Section 3.14 for details) and would, therefore, not significantly exacerbate the City's parkland deficiency. Furthermore, the project applicant would be required to pay development fees that would help support recreational facilities in the City. Payment of fees would help address any incremental increase in demand for recreational facilities that may be caused by the project. Additionally, the proposed project would include 46,679 sf. of open space for residents and patrons of the retail and restaurant space. This on-site open space would serve, in part, to alleviate any potential increases in the use of nearby park facilities (see Figure 2-2). For these reasons, impacts to park facilities from implementation of the proposed project would be **less than significant**. No mitigation is required.

Other public facilities?

Less Than Significant Impact. Other public facilities and services provided within the City include library services and City administrative services. Library services are provided by the Covina Public Library, located at 234 North Second Avenue, approximately 0.2 mile from the project site. The residents, employees, and customers of the proposed project could use the City's library services, but the increase in use would not be significant relative to citywide demand. As described in Section 3.14, the proposed project would not be expected to generate substantial population growth within the City. In the unlikely event that the proposed project were to cause population growth in the City, this growth would be minor (approximately one % of the population, given worst-case-scenario conditions). Thus, it is anticipated that existing library and City administrative services would accommodate any negligible increase in demand due to implementation of the proposed project. As such, impacts to other public facilities in the area would be **less than significant**. No mitigation is required.

References

- Covina Police Department. 2017. "Service Area Policing." Webpage. Accessed April 19, 2019. <http://www.covinaca.gov/police/page/service-area-policing>.
- Covina Valley Unified School District. 2019. "School Site Locator." Accessed April 19, 2019. http://www.cvusd.k12.ca.us/school_locator.
- Takeshita, M. 2019. Request for Service Information. Letter correspondence between Michael Takeshita, Acting Chief, Forestry Division (Los Angeles County Fire Department – Prevention Services Bureau) and Dudek. May 14, 2019.
- Stabio, S. 2019. City of Covina police Department. 2019. Information Request for Covina Hassen Development Project (Police Services). Email correspondence between Stephanie Stabio (City of Covina Police Department) and Dudek. May 14, 2019.
- McEntire, R. 2019. Information Request for Proposed Covina Hassen Development Project (School Facilities). Email correspondence between Robert McEntire and Dudek. May 15, 2019.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

Less Than Significant Impact. As stated in Section 3.15, the residents, employees, and customers of the proposed project could use nearby park facilities. Nearby recreation facilities include Cypress Park (eight acres, located 0.5 mile northwest of the project site), Edna Park (two acres, located 0.2 mile northwest of the project site), Kelby Park (six acres, located 0.55 mile northeast of the project site), Covina Park (10 acres, located 0.2 mile west of the project site), and Civic Center Park (1.5-acre, located less than 0.1 mile southeast of the project site). The City contains approximately 62 acres of parkland, comprised of nine parks and two ballparks. Additionally, the 11-acre Walnut Creek Park, which is owned by the County of Los Angeles, lies within the boundaries of the City. At the time of General Plan adoption in 2000, the City had 1.3 acres of open space for every 1,000 residents. This ratio is considered significantly below the National Park and Recreation Association's guideline of 2.5–4.0 acres of parkland for every 1,000 residents (City of Covina 2000). While the City is currently deficient in parkland acreage,

implementation of the proposed project would not substantially exacerbate this issue. While the proposed project would incrementally increase the population in the City (by approximately one %), the amount of growth would be minor relative to the City's existing and future population (see Section 3.14 for details) and would, therefore, not significantly exacerbate the City's parkland deficiency. Furthermore, the project applicant would be required to pay a development impact fee that would help support recreational facilities in the City. Payment of fees would help address any incremental increase in demand for recreational facilities that may be caused by the project. Additionally, the proposed project would include 46,679 sf of outdoor area for residents and patrons of the retail shops and restaurants (see Figure 2-2). This on-site open space would serve, in part, to alleviate any potential increases in the use of nearby recreational facilities. For these reasons, impacts to recreational facilities from implementation of the proposed project would be **less than significant**. No mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than significant Impact. As stated above in 3.16(a), the proposed project would include approximately 46,679 sf of outdoor area, which would include exterior courtyards with turf/lawn, barbeque pits, pedestrian amenities and community tables/benches. These recreational areas are included as part of the proposed project and, therefore, have been analyzed for their potential environmental effects in this IS/MND. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project. As described above in Section 3.16(a), the proposed project would not require construction or expansion of recreational facilities. Impacts would be **less than significant**, and no mitigation is required.

References

None.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This analysis is based on the Traffic Impact Study (TIS) for the Covina Townhomes (Site A) Project (2018) and an Addendum to the TIS (2019), which were both prepared by Linscott, Law, and Greenspan Engineers (LLG) and included in this IS/MND as Appendix H.

Transportation Setting

The proposed project is generally bounded by the existing Covina Metrolink Station parking structure and Geneva Place to the north, San Bernardino Road to the south, Citrus Avenue to the east, and 3rd Avenue to the west. As shown in Figure 3.17-1, immediate access to the project site is provided via Citrus Avenue, San Bernardino Road, 3rd Avenue, and Geneva Place.

Citrus Avenue is a north-south oriented roadway that borders the project site to the east. Citrus Avenue is designated as a Secondary Arterial in the City's General Plan, except between Orange Street and Badillo Street where it is designated as a Collector road. Two through-travel lanes are provided in each direction on Citrus Avenue north of San Bernardino Avenue, and one through-travel lane is provided in each direction south of San Bernardino Avenue.

San Bernardino Road is an east-west oriented roadway that borders the project site to the south. San Bernardino Road is designated as a Collector road in the City's General Plan. One through-travel lane is provided in each direction west of Citrus Avenue, and one to two through-travel lanes are provided in each direction east of Citrus Avenue in the study area.

3rd Avenue is a north-south oriented roadway that borders the project site to the west. 3rd Avenue is designated as a Local Street in the City's General Plan. One through-travel lane is provided in each direction on 3rd Avenue in the study area.

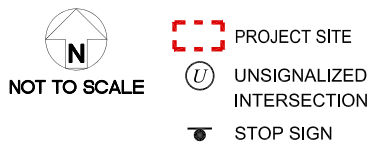
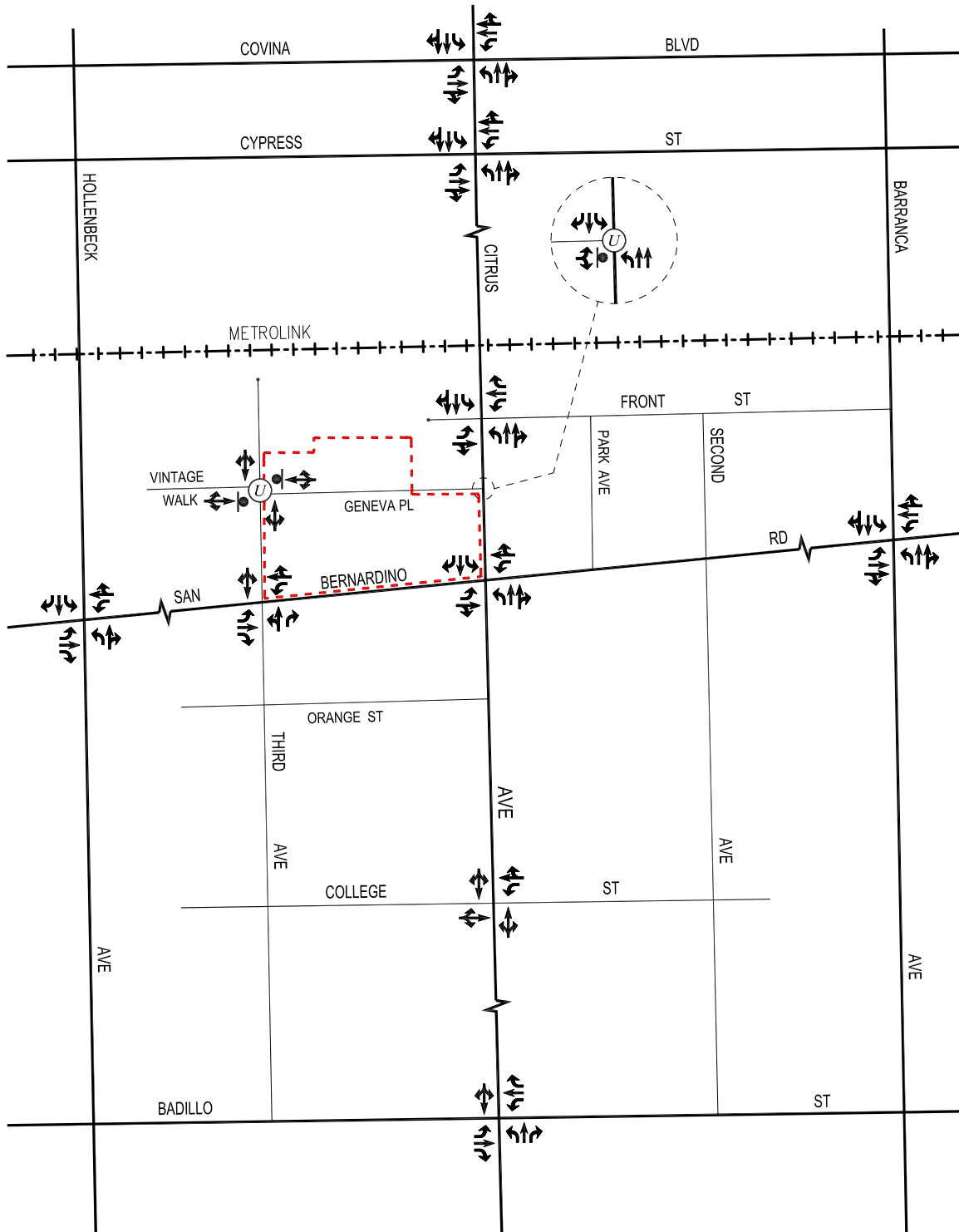
Geneva Place is an east-west oriented roadway located partially within the project site. Geneva Place is designated as a Local street in the City's General Plan. One through-travel lane is provided in each direction on Geneva Place in the study area. Geneva Place is planned to be partially vacated to accommodate the proposed project, with a closure extending east from 3rd Avenue to approximately 200 feet west of Citrus Avenue.

Other roadways that provide regional access to the project site include Hollenbeck Avenue, Barranca Avenue, Covina Boulevard, Cypress Street, Front Street, College Street, and Badillo Street. Roadways and lane configurations in the project area are shown in Figure 3.17-2.

The project site is located within the boundaries of the TCSP. The TCSP envisions downtown Covina as “a place where people can live, work, shop, and play without needing their cars” and was developed with the goal to “encourage more people to live downtown” and to “encourage people to leave their cars behind” (City of Covina 2004). The project site is located within a designated Mixed-Use Focused Activity Area, which emphasizes the “mixing of uses on properties, within buildings, and within blocks.”

As such, the proposed project site is well-located to encourage the use of public transit and active transportation modes. The project site is 500 feet southwest of the Covina Metrolink Station (located at 600 Citrus Avenue), which provides commuter rail service into Downtown Los Angeles, while local public transit is provided along Citrus Avenue.

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SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-2

Existing Lane Configurations

Covina Hassen Development Project (Site A)

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Public Bus Transit Service

Public bus transit service in the project area is provided by Foothill Transit, Metro, and the City of Glendora. Foothill Transit operates one north-south route along Citrus Avenue. Line 281 connects the City of Industry to the City of Glendora, providing two northbound and two southbound buses in the project study area during the AM and PM peak hours. Metro operates one east-west route along Badillo Street and Citrus Avenue. Line 190 connects the City of El Monte to Cal Poly Pomona, providing up to four eastbound and five westbound buses in the project study area during the AM and PM peak hours. The City of Glendora operates a Commuter Shuttle that connects to the Covina Metrolink Station via Front Street and Citrus Avenue, providing up to two buses in the AM and PM peak hours.

Regional Rail Service

Metrolink provides a rail stop about 500 feet from the project site for the San Bernardino Line, which extends between Union Station in Downtown Los Angeles and the City of San Bernardino. This Metrolink stop provides connectivity between the proposed project and the regional network of rail lines operated by Amtrak, Metro, and the Southern California Regional Rail Authority. The Covina Metrolink Station is located north of Front Street on the east side of Citrus Avenue and connects with the public bus transit services provided on Citrus Avenue. During the weekday AM peak hour, five trains per hour are provided at the Covina Metrolink Station: four travel westbound to Los Angeles Union Station, and one travels eastbound to the City of San Bernardino. During the weekday PM peak hour, four trains per hour are provided at the Covina Metrolink Station: three travel eastbound to the City of San Bernardino, and one travels westbound to Los Angeles Union Station.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law, which changed the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to require analysis of VMT as the new metric for evaluating transportation impacts.

Once the new transportation guidelines are adopted, LOS, or automobile delay, will no longer be considered an environmental impact under CEQA. Per OPR's Final Proposed Updates to the CEQA Guidelines released on November 27, 2017, OPR proposes to add Section 15064.3 to the CEQA Guidelines, which would provide that, in most cases, VMT is the most appropriate measure of transportation impacts. OPR also proposed several changes to the questions related to transportation in Appendix G of the CEQA Guidelines. First, OPR proposed to revise the question related to "measures of effectiveness" (threshold question A) so that the analysis focuses on circulation elements of city and county general plans and other land use plans governing transportation. Second, OPR proposed to delete the second question related to LOS and insert references to proposed new Section 15064.3. Third, OPR proposed to clarify the question related to design features.

The new Section 15064.3(b), "Criteria for Analyzing Transportation Impacts," states "If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

OPR's regulatory text indicates that a public agency may immediately commence implementation of the transportation impact guidelines, however, the guidelines shall be applied by all lead agencies, statewide, by July 1, 2020. At this time, the City has not yet implemented VMT as a primary traffic evaluation methodology. As such, the

proposed project's potential to impact transportation and circulation has been evaluated by analyzing changes in LOS at eleven impacted intersections surrounding the project site consistent with the City's current Traffic Impact Analysis Guidelines (2014).

a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Less Than Significant Impact. The traffic impact study for the proposed project follows the City's traffic study guidelines and is consistent with the traffic impact assessment guidelines set forth in the Los Angeles County Congestion Management Program.

The traffic analysis evaluates potential project-related impacts at eleven study intersections in the vicinity of the project site. These intersections were considered as they have the greatest potential to experience traffic impacts as a result of the proposed project. The intersections were evaluated during the weekday morning and afternoon peak hours. Figure 3.17-1 illustrates the project site location and the location of the study area intersections. The eleven intersections are as follows:

1. Hollenbeck Avenue/San Bernardino Road
2. 3rd Avenue/Vintage Walk – Geneva Place (unsignalized)
3. 3rd Avenue/San Bernardino Road
4. Citrus Avenue/Covina Boulevard
5. Citrus Avenue/Cyprus Street
6. Citrus Avenue/Front Street
7. Citrus Avenue/Geneva Place (unsignalized)
8. Citrus Avenue/San Bernardino Road
9. Citrus Avenue/College Street
10. Citrus Avenue/Badillo Street
11. Barranca Avenue/San Bernardino Road

Nine of the study intersections selected for analysis are currently controlled by traffic signals, while the remaining two study intersections, 3rd Avenue/Vintage Walk - Geneva Place and Citrus Avenue/Geneva Place, are controlled with two-way stop signs (see Figure 3.16-2).

Traffic Impact Analysis Methodology

In order to estimate the traffic impact characteristics of the proposed project, a multi-step process was utilized, as follows:

1. Forecasting trip generation, which estimates the total arriving and departing traffic volumes from the proposed project on a peak hour and daily basis. The traffic generation potential is typically forecast by applying the appropriate vehicle trip generation equations or rates to the project development tabulation.
2. Forecasting trip distribution, which identifies the origins and destinations of inbound and outbound project traffic volumes. These origins and destinations are typically based on demographics and existing/anticipated travel patterns in the study area.

3. Forecasting traffic assignment, which involves the allocation of project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway links and intersection turning movements throughout the study area.

With the forecasting process complete and project traffic assignments developed, the impact of the proposed project is evaluated by comparing LOS conditions at the study area intersections using existing and expected future traffic volumes with and without anticipated project traffic. Based on the outcome of the “with project” conditions, the effects of the project are measured against City traffic guidelines to determine their significance.

Signalized Intersections

Of the eleven study intersections, nine are currently signalized. The signalized intersections were evaluated using the Intersection Capacity Utilization (ICU) method of analysis, which determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The ICU method is intended for signalized intersection analysis and determines the v/c ratios on a critical lane basis (i.e., based on the individual v/c ratios for key conflicting traffic movements). The ICU numerical value represents the percent signal (green) time, and thus capacity, required by existing and/or future traffic. It should be noted that the ICU methodology assumes uniform traffic distribution per intersection approach lane and optimal signal timing. The overall intersection v/c ratio is subsequently assigned an LOS value to describe intersection operations.

Unsignalized Intersection

The two unsignalized study intersections are currently two-way stop-controlled (TWSC). The unsignalized intersections were evaluated using the methodology outlined in Chapter 19 of the 2010 Highway Capacity Manual (HCM). The HCM method determines the average control delay experienced at the intersections. Average control delay for any particular movement is a function of the capacity of the approach and the degree of saturation. The average control delay is measured in seconds per vehicle, and includes delay due to deceleration to a stop at the back of the queue from free-flow speed, move-up time within the queue, stopped delay at the front of the queue, and delay due to acceleration back to free-flow speed. A description of the HCM method and corresponding LOS is also provided in Appendix H.

The TWSC methodology estimates the average control delay for each minor-street movement (or shared movement) as well as major-street left-turns and determines the LOS for each constrained movement. LOS is not defined for the overall TWSC intersection because major-street movements with no delays typically result in a weighted average delay that is extremely low. As directed by the City’s Traffic Impact Analysis Guidelines, the worst approach lane group control delay is reported in place of overall intersection control delay.

Impact Criteria and Thresholds

The relative impact of the added project traffic volumes generated by the proposed project during the weekday AM and PM peak hours was evaluated based on analysis of existing and future operating conditions at the study intersections, without and with the proposed project. The previously discussed capacity analysis procedures were utilized to evaluate the future v/c or delay relationships and LOS characteristics at each study intersection.

The significance of the potential project-generated traffic impacts was identified using the traffic impact criteria set forth in the City's Traffic Impact Analysis Guidelines. According to the City's guidelines, a significant transportation impact is determined based on the impact threshold criteria presented in Table 3.17-1, City of Covina - Signalized Intersection Impact Threshold Criteria, and Table 3.17-2, City of Covina - Unsignalized Intersection Impact Threshold Criteria.

Table 3.17-1. City of Covina – Signalized Intersection Impact Threshold Criteria

Pre-Project v/c	Level of Service	Project Related Increase in v/c
0.71 – 0.80	C	Equal or greater than 0.04
0.81 – 0.90	D	Equal or greater than 0.02
0.91 – or more	E/F	Equal or greater than 0.01

Source: Appendix H

Table 3.17-2. City of Covina – Unsignalized Intersection Impact Threshold Criteria

Pre-Project v/c	Level of Service	Project Related Increase in v/c
≤ 25.0 seconds	A/B/F	LOS D or worse
> 25.0 seconds	D/E/F	Equal to or greater than 5.0 seconds

Source: Appendix H

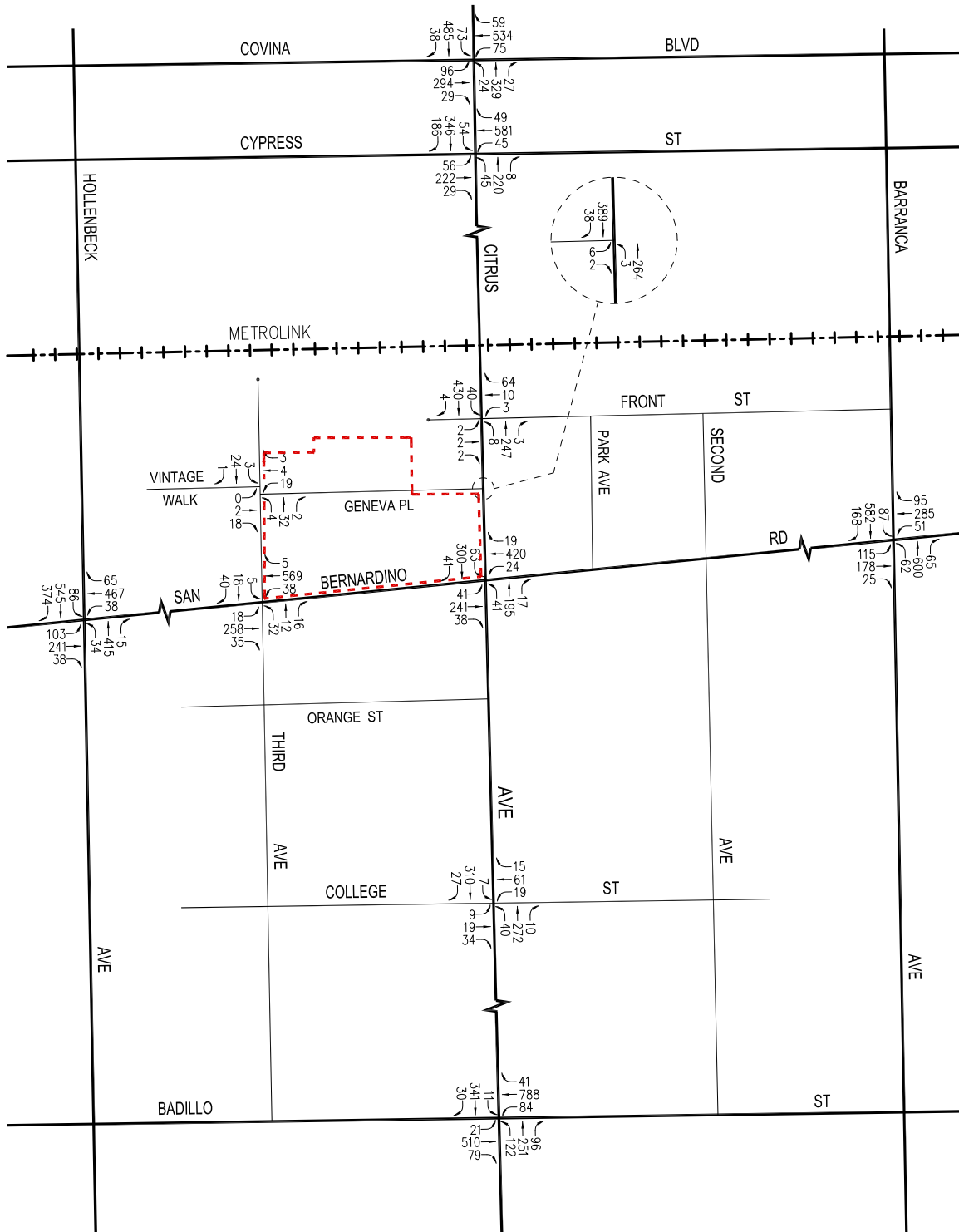
LOS calculations were prepared for the study intersections under the following scenarios:

- Existing conditions.
- Condition (a) with completion and occupancy of the proposed project, including existing traffic volume shifts due to the partial street vacation of Geneva Place.
- Condition (a) plus one percent (1%) annual ambient traffic growth through the year 2021 and with the completion and occupancy of the related projects (shown in Table 3.17-4).
- Condition (d) with completion and occupancy of the project site, including existing traffic volume shifts due to the partial vacation of Geneva Place.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization or control delay at the study intersections.

Existing Traffic Volumes

Existing LOS values and traffic volumes are shown in Table 3.17-3 and illustrated in Figure 3.17-3 and Figure 3.17-4, respectively, for the AM and PM peak hours. Nine of the study intersections are presently operating at LOS B or better during the weekday AM and PM peak hours under existing conditions. Two of the study intersections (i.e., Intersection No.1: Hollenbeck Avenue/San Bernardino Road and Intersection No. 10: Citrus Avenue/Badillo Street) are currently operating at LOS E during the weekday PM peak hour.



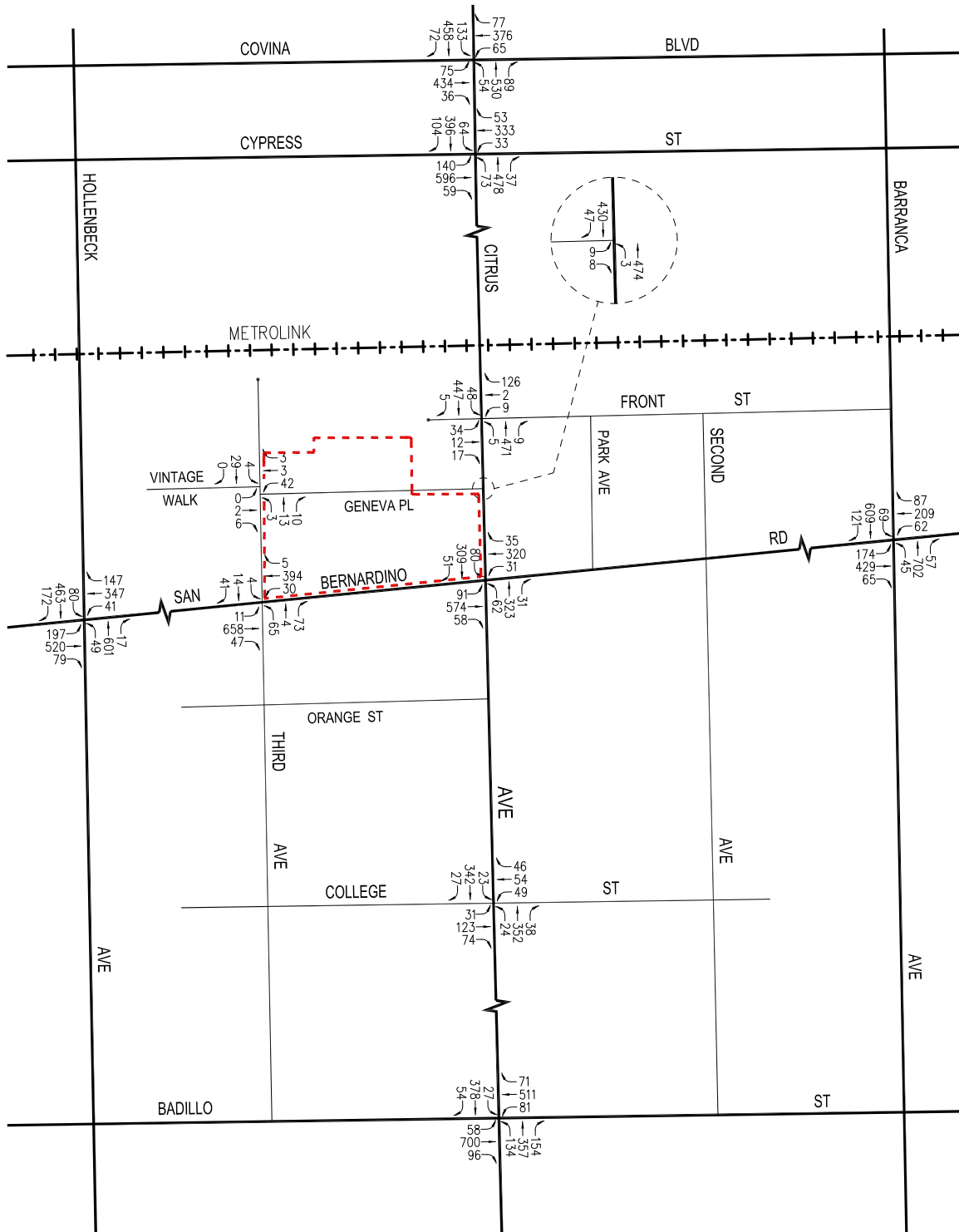
SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-3

Existing Traffic Volumes: Weekday AM Peak Hour

Covina Hassen Development Project (Site A)

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 PROJECT SITE

SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-4

Existing Traffic Volumes: Weekday PM Peak Hour
Covina Hassen Development Project (Site A)

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Cumulative Development Projects

A forecast of on-street traffic conditions prior to occupancy of the proposed project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the proposed project can be evaluated within the context of the cumulative impact of all ongoing development. The related projects research was based on information on file at the City of Covina Community Development Department. City of West Covina Planning Department was also contacted and no related projects within the study area were identified. The related projects in the study area are presented in Table 3.17-4 below.

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the *ITE Trip Generation Manual*. The related project's respective traffic generation for the weekday AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized in Table 3.17-4. As shown in Table 3.17-4, the related projects are expected to generate a combined total of 14,134 daily trips during a typical weekday, 1,199 vehicle trips (678 inbound trips and 521 outbound trips) during the weekday AM peak hour, and 1,125 vehicle trips (502 inbound trips and 623 outbound trips) during the weekday PM peak hour. See Appendix H for details.

In order to account for unknown related projects not included in this analysis, the existing traffic volumes were increased at an annual rate of one percent (1.0%) per year to the year 2020 (i.e., the anticipated year of project build-out). The ambient growth factor was based on general traffic growth factors provided in the 2010 CMP manual. The general traffic growth factors provided in the CMP manual for the Regional Statistical Area (RSA) 26, which includes the Covina and West Covina areas, has an annual traffic volume growth rate of approximately 0.46% per year between years 2010 and 2020. Thus, application of a one percent (1.0%) annual growth factor allows for a conservative, worst case forecast of future traffic volumes in the area. Further, it is noted that the CMP manual's traffic growth rate is intended to anticipate future traffic generated by development projects in the project vicinity. Thus, the inclusion in this traffic analysis of both a forecast of traffic generated by the known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data results in a conservative estimate of future traffic volumes at the study intersections.

Project Trip Generation

The trip generation rates and forecast of the vehicular trips anticipated to be generated by the proposed project are presented in Table 3.17-5 below and illustrated in Figure 3.17-5 and Figure 3.17-6, respectively, for the AM and PM peak hours. The project trip generation forecast was submitted for review and approval by City staff. As summarized in Table 3.17-5, the proposed project is expected to generate a net increase of 1,700 daily trips; 108 vehicle trips (36 inbound trips and 72 outbound trips) during the weekday AM peak hour; and, 145 vehicle trips (87 inbound trips and 58 outbound trips) during the weekday PM peak hour.

Existing with Project Conditions

Existing with Project LOS and traffic volumes are shown in Table 3.17-3, and illustrated in Figure 3.17-7 and Figure 3.17-8, respectively, for the AM and PM peak hours. Application of the City's threshold criteria to the this scenario indicates that the proposed project is not expected to create significant impacts at any of the study intersections. Incremental, but not significant, impacts are noted at the study intersections. It should also be noted that the redistribution of the traffic volumes due to the partial street vacation of

Geneva Place at the surrounding intersections in the vicinity of Geneva Place (i.e., the Third Avenue/San Bernardino Road, Citrus Avenue/Front Street, and Citrus Avenue/San Bernardino Road intersections) is reflected in the Existing With Project conditions. Because there are no significant impacts, no traffic mitigation measures are required under the “Existing with Project” condition.

Future without Project Conditions

The Future without Project Conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The v/c ratios and delays at the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed in Table 3.17-4. Future without Project LOS and traffic volumes are shown in Table 3.17-3, and illustrated in Figure 3.17-9 and Figure 3.17-10¹⁵, respectively, for the AM and PM peak hours. Based on the table, nine of the eleven of the study intersections are expected to continue operating at LOS C or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects’ traffic under the Future without Project condition. Two of the study intersections (i.e., Intersection No. 1: Hollenbeck Avenue/San Bernardino Road and Intersection No. 10: Citrus Avenue/Badillo Street) are anticipated to operate at LOS E during the AM and/or PM peak hours for the Future without Project condition.

Future with Project Conditions

As shown in Table 3.17-3 and, Future with Project traffic volumes illustrated in Figure 3.17-11 and Figure 3.17-12, respectively for the AM and PM peak hours, application of the City’s threshold criteria in this scenario indicates that the proposed project is not expected to create significant impacts at any of the study intersections. Incremental, but not significant, impacts are noted at the study intersections. Because there are no significant impacts, no traffic mitigation measures are required or recommended for the study intersections under the “Future with Proposed Project” condition. It should also be noted that the redistribution of the existing traffic volumes due to the partial street vacation of Geneva Place is not expected to result in a significant impact at any of the surrounding intersections in the vicinity of Geneva Place (i.e., at the Third Avenue/San Bernardino Road, Citrus Avenue/Front Street, and Citrus Avenue/San Bernardino Road intersections) for the Future with Project condition.

¹⁵ Traffic volumes shown in Figures 3.17-9 and 3.17-10 have been updated in the TIS Addendum (2019) included in Appendix H.

Table 3.17-3. Summary of Volume to Capacity Ratios and LOS During Weekday AM and PM Peak Hours

No	Intersection		Existing		Existing with Project		Difference between Existing and Existing with Project		Future without Project		Future with project		Difference between Future without- and Future with project	
		Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Significant Impact*	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Significant Impact
1	Hollenbeck Avenue/ San Bernardino Road	AM	0.809	D	0.814	D	0.005	No	0.846	D	0.852	D	0.006	No
		PM	0.918	E	0.927	E	0.009	No	0.964	E	0.973	E	0.009	No
2	Third Avenue/ Vintage Walk- Geneva Place	AM	9.1	A	9.0	A	-0.1	No	9.1	A	9.0	A	-0.1	No
		PM	9.1	A	8.9	A	-0.2	No	9.1	A	8.8	A	-0.3	No
3	Third Avenue/ San Bernardino Road	AM	0.479	A	0.503	A	0.024	No	0.502	A	0.525	A	0.023	No
		PM	0.558	A	0.546	A	-0.012	No	0.586	A	0.574	A	-0.012	No
4	Citrus Avenue/ Covina Boulevard	AM	0.474	A	0.476	A	0.002	No	0.507	A	0.509	A	0.002	No
		PM	0.515	A	0.519	A	0.004	No	0.556	A	0.559	A	0.003	No
5	Citrus Avenue/ Cypress Street	AM	0.476	A	0.481	A	0.005	No	0.503	A	0.508	A	0.005	No
		PM	0.477	A	0.491	A	0.014	No	0.505	A	0.519	A	0.014	No
6	Citrus Avenue/ Front Street	AM	0.232	A	0.238	A	0.006	No	0.247	A	0.253	A	0.006	No
		PM	0.330	A	0.333	A	0.003	No	0.351	A	0.353	A	0.002	No
7	Citrus Avenue/ Geneva Place	AM	12.0	B	12.0	B	0.0	No	12.6	B	12.5	B	-0.1	No
		PM	12.8	B	13.4	B	0.6	No	13.6	B	14.2	B	0.6	No
8	Citrus Avenue/ San Bernardino Road	AM	0.563	A	0.586	A	0.023	No	0.6	A	0.623	B	0.023	No
		PM	0.696	B	0.710	C	0.014	No	0.743	C	0.757	C	0.014	No
9	Citrus Avenue/ College Street	AM	0.343	A	0.351	A	0.008	No	0.369	A	0.376	A	0.007	No
		PM	0.496	A	0.508	A	0.012	No	0.529	A	0.541	A	0.012	No

Table 3.17-3. Summary of Volume to Capacity Ratios and LOS During Weekday AM and PM Peak Hours

No	Intersection		Existing		Existing with Project		Difference between Existing and Existing with Project		Future without Project		Future with project		Difference between Future without- and Future with project	
		Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Significant Impact*	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Significant Impact
10	Citrus Avenue/Badillo Street	AM	0.871	D	0.879	D	0.008	No	0.921	E	0.929	E	0.008	No
		PM	0.910	E	0.918	E	0.008	No	0.963	E	0.971	E	0.008	No
11	Barranca Avenue/San Bernardino Road	AM	0.514	A	0.521	A	0.007	No	0.545	A	0.552	A	0.007	No
		PM	0.532	A	0.537	A	0.005	No	0.561	A	0.567	A	0.006	No

Source: Appendix H / **Notes:** Counts conducted by City Traffic Counters in May 2018.

Table 3.17-4. Related Projects List and Trip Generation

Project Status	Project Address	Proposed Land Use	Daily Trips	AM Peak Hour	PM Peak Hour
Approved	400 N. Citrus Avenue	Condo (68 DU) / Retail (5,794sf)	642	36	56
Proposed	Park View Drive, south of Holt	Hotel (130 keys)	1,062	69	78
Built	166 E. Center Street	Apartment (5 DU)*	33	3	3
Built	269-275 W. Center Street	Apartment (8 DU)	53	4	5
Proposed	250 E. San Bernardino Road	Church Addition (9,400 sf)	86	5	5
Built	210 W. San Bernardino Road	Hospital Addition (3,000 sf)	40	3	3
Built	500 W. San Bernardino Road	Medical Office (9,000 sf)	325	22	32
Built	611 S. Citrus Avenue	Starbucks (1,867 sf)	1,528	188	80
Built	108 E. Arrow Highway	Starbucks (1,840)	1,506	185	79
Built	635 S. Citrus Avenue	Automobile Sales (30,000 sf)	744	30	45
Under Construction	800 N. Banna Avenu	Residential (63 DU)/park (2ac)	600	47	63
Approved	1732 E Ruddock Street	Residential (4 DU)	38	3	4
Under Construction	777 Enda Place	Light Industrial (99,272 sf)	692	91	96
Proposed	Covina Hassen (N Citrus)	Townhomes (18 DU) /Mixed Use (4,400 sf)	219	13	21
Graded	1162 N. Citrus Avenue	Condo (117)/ Mixed Use (44,800 sf)	1,896	130	170

Table 3.17-4. Related Projects List and Trip Generation

Project Status	Project Address	Proposed Land Use	Daily Trips	AM Peak Hour	PM Peak Hour
Approved	1650 E. Old Badillo	Assisted living (32 beds)	88	6	9
Built	308 Barranca Avenue	Townhomes (5 DU)	29	2	3
Approved	276 W. Dexter Street	Condominium (3 DU)	17	1	2
Under Construction	172 E. Center Street	Apartment (5 DU)	33	3	3
Approved	525 S. Citrus Avenue	Mixed Use (10,900 sf)	2,733	233	185
Proposed	1123 Park View Drive	Medical Office	1,517	100	150
Proposed	Park View Drive/Holt Avenue	Assisted Living (90 beds)	249	16	26

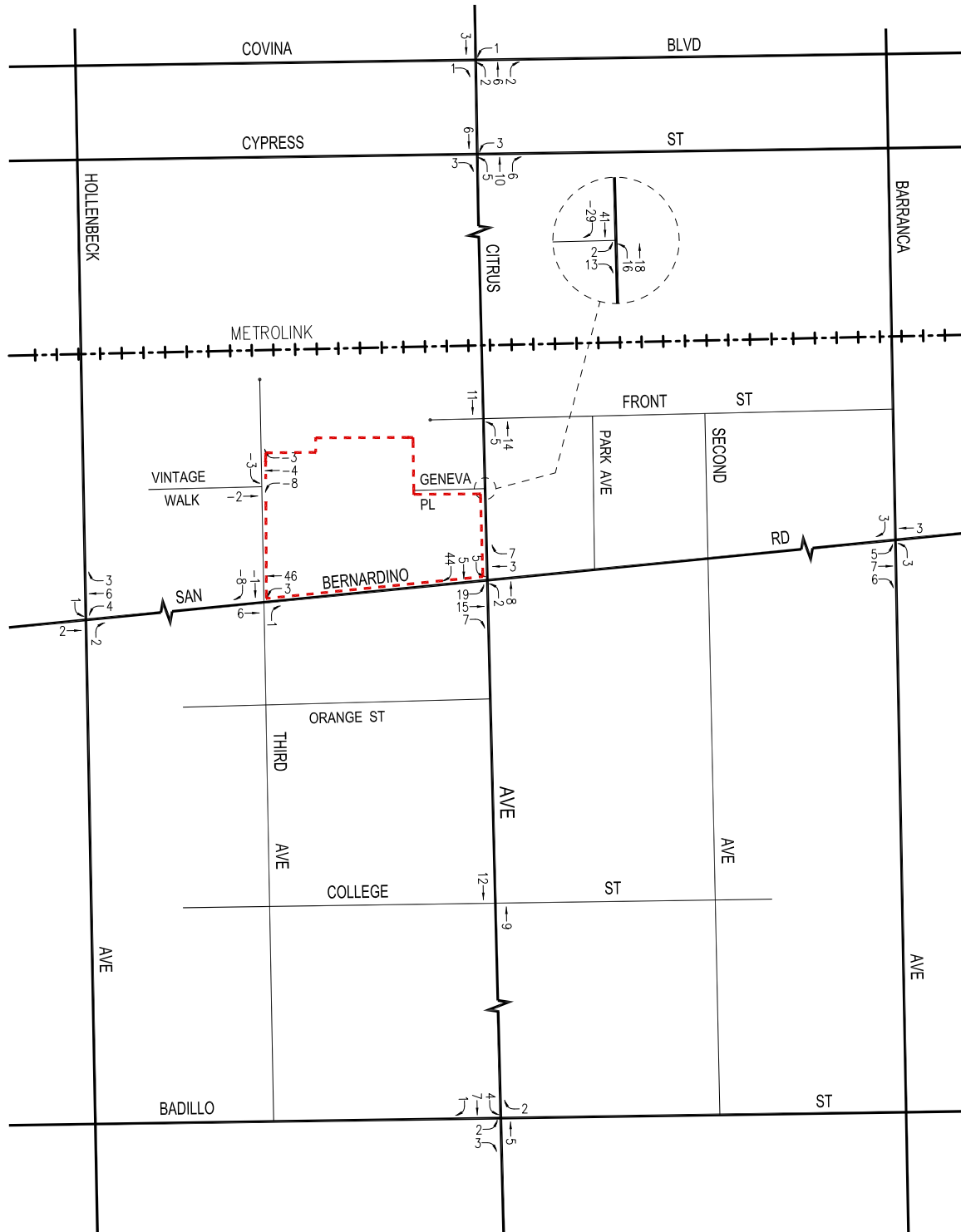
Source: Appendix H

Table 3.17-5. Project Trip Generation

Land Use	Size	Daily Trip Volume	AM Peak Hour Volumes			PM Peak Hour Volumes		
			In	Out	Total	In	Out	Total
Residential Townhome	161 DU	936	12	59	71	56	28	84
Restaurant	3,800 sf	483	23	18	41	22	15	37
Retail	13,500 sf	576	8	5	13	24	26	50
Less Pass-by Adjustment (10%)		(106)	(3)	(2)	(5)	(5)	(4)	(9)
Less Ransit Adjustment (10%)		(189)	(4)	(8)	(12)	(10)	(7)	(17)

Source: Appendix H

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SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-5

Net New Project Traffic Volumes: Weekday AM Peak Hour

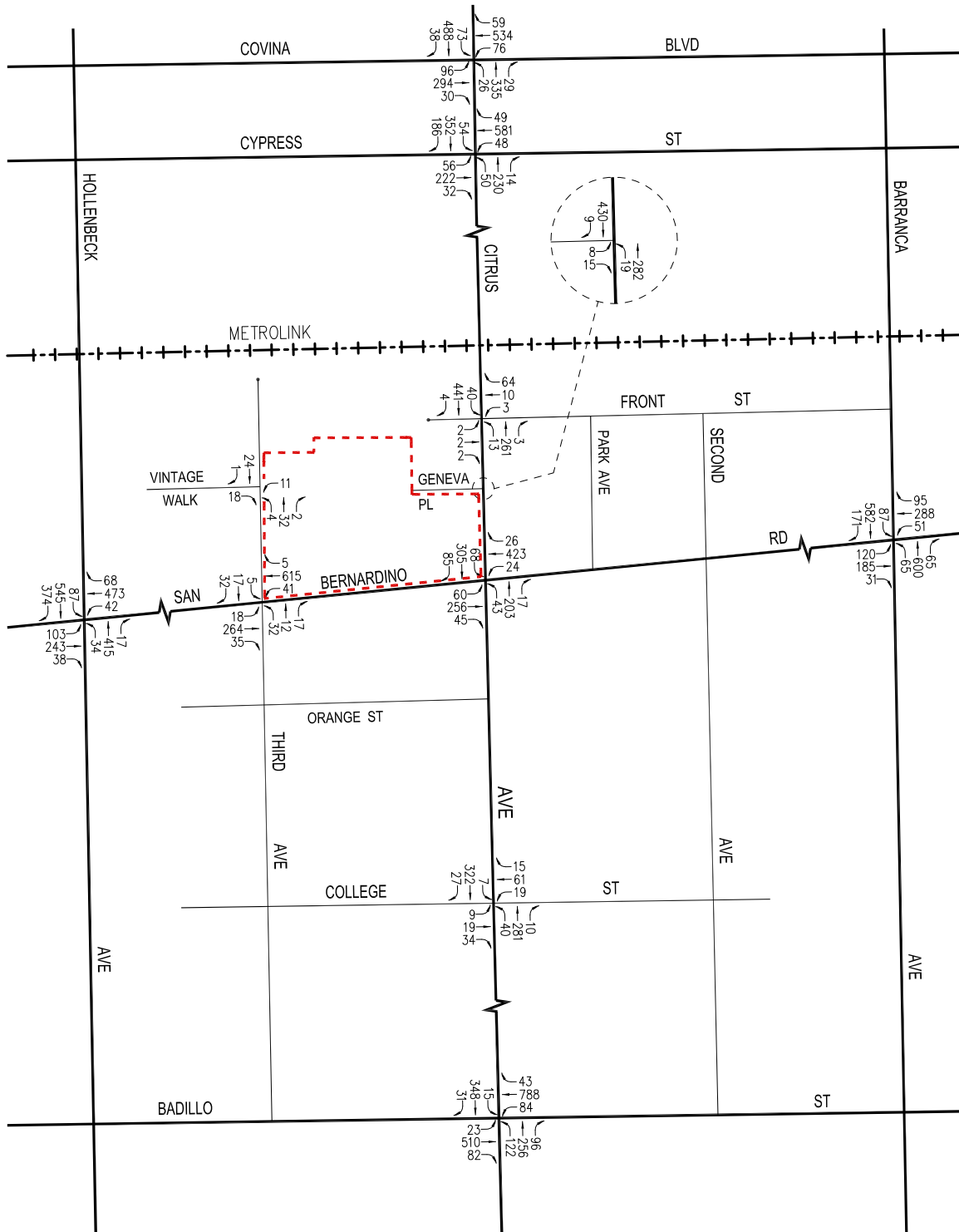
Covina Hassen Development Project (Site A)

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Covina Hassen Development Project (Site A)

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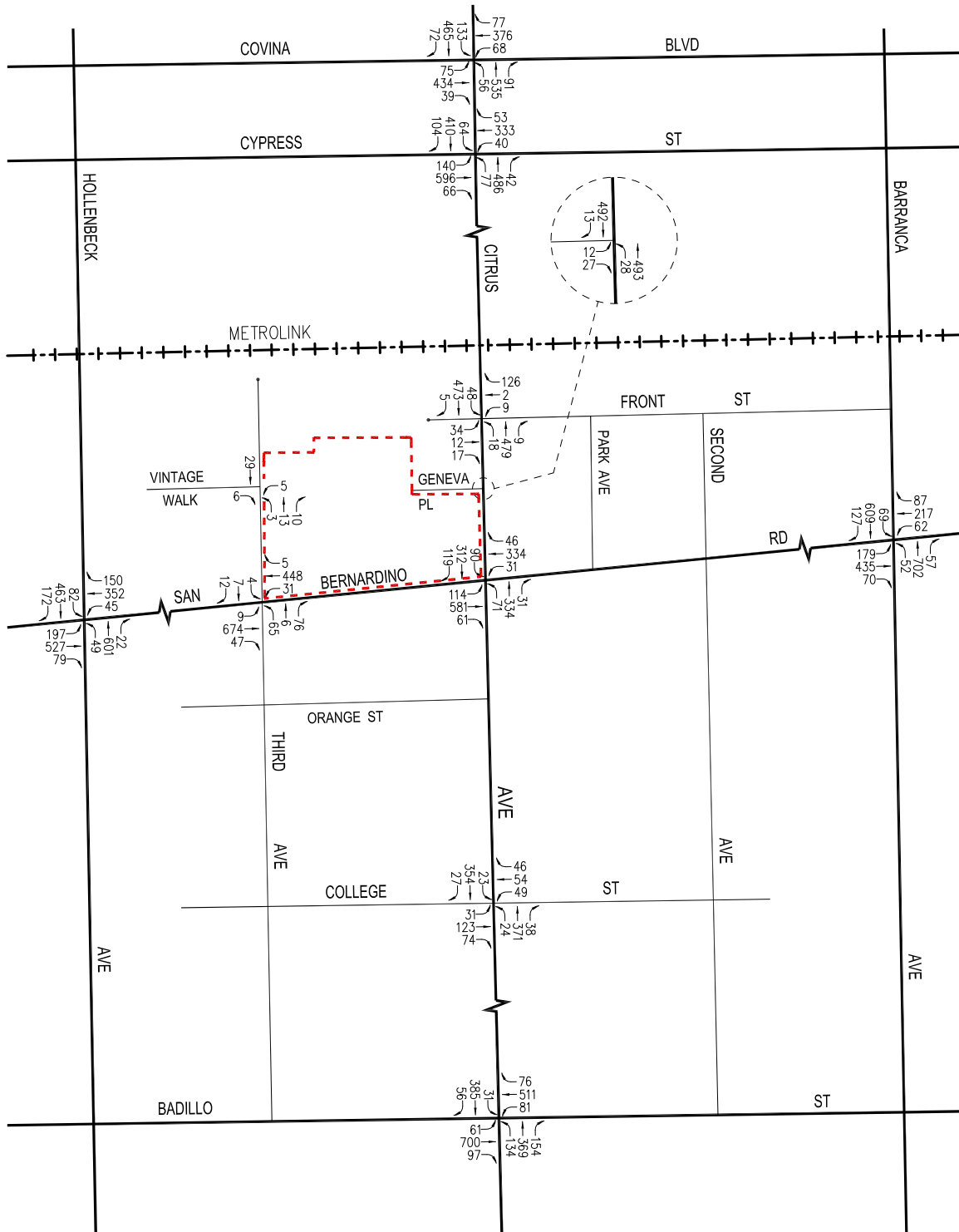
SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-7

Existing with Project Traffic Volumes: Weekday AM Peak Hour

Covina Hassen Development Project (Site A)

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  PROJECT SITE

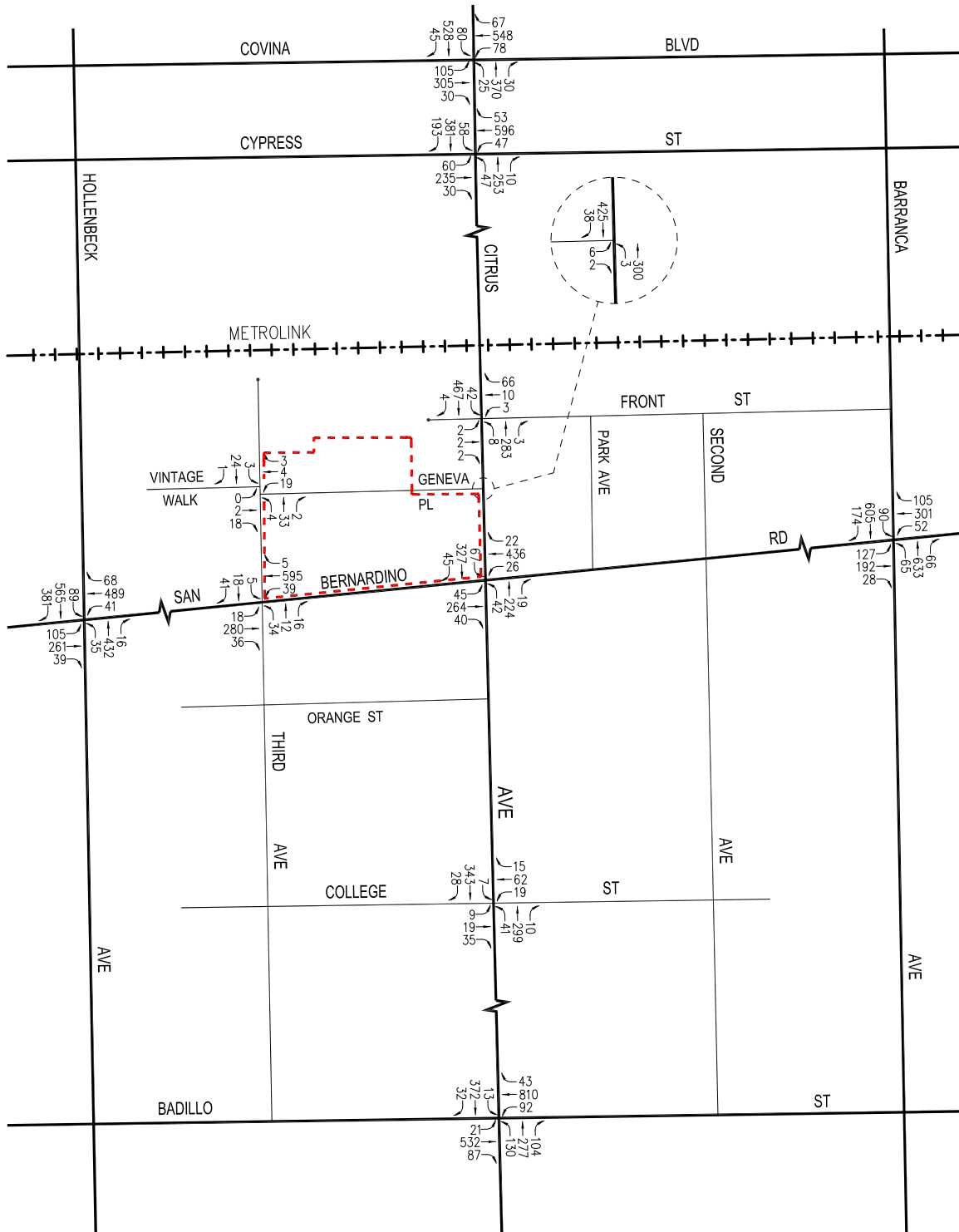
SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-8

Existing with Project Traffic Volumes: Weekday PM Peak Hour

Covina Hassen Development Project (Site A)

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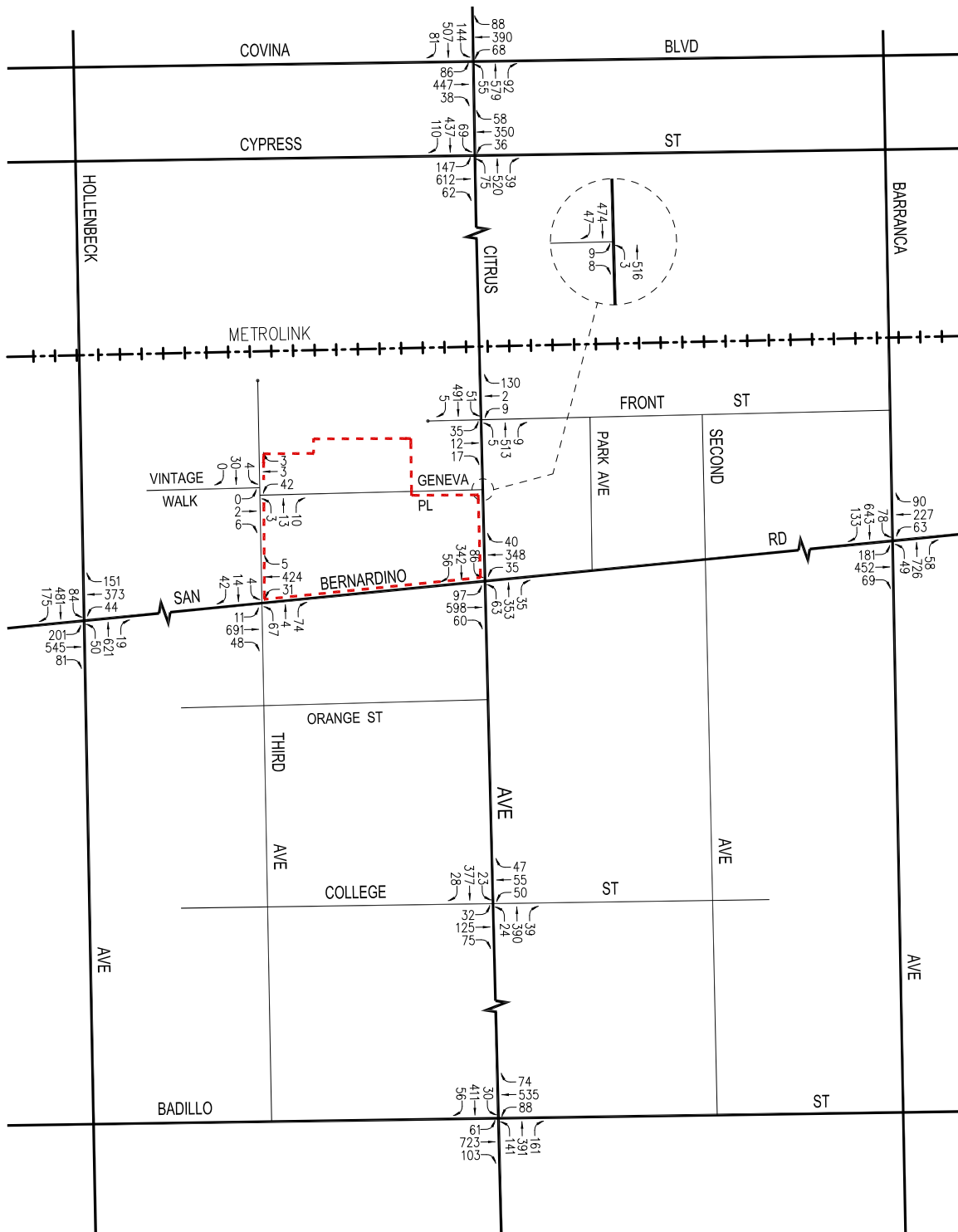
SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-9

Future without Project Traffic Volumes: Weekday AM Peak Hour

Covina Hassen Development Project (Site A)

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 NOT TO SCALE
  PROJECT SITE

SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-10

Future without Project Traffic Volumes: Weekday PM Peak Hour

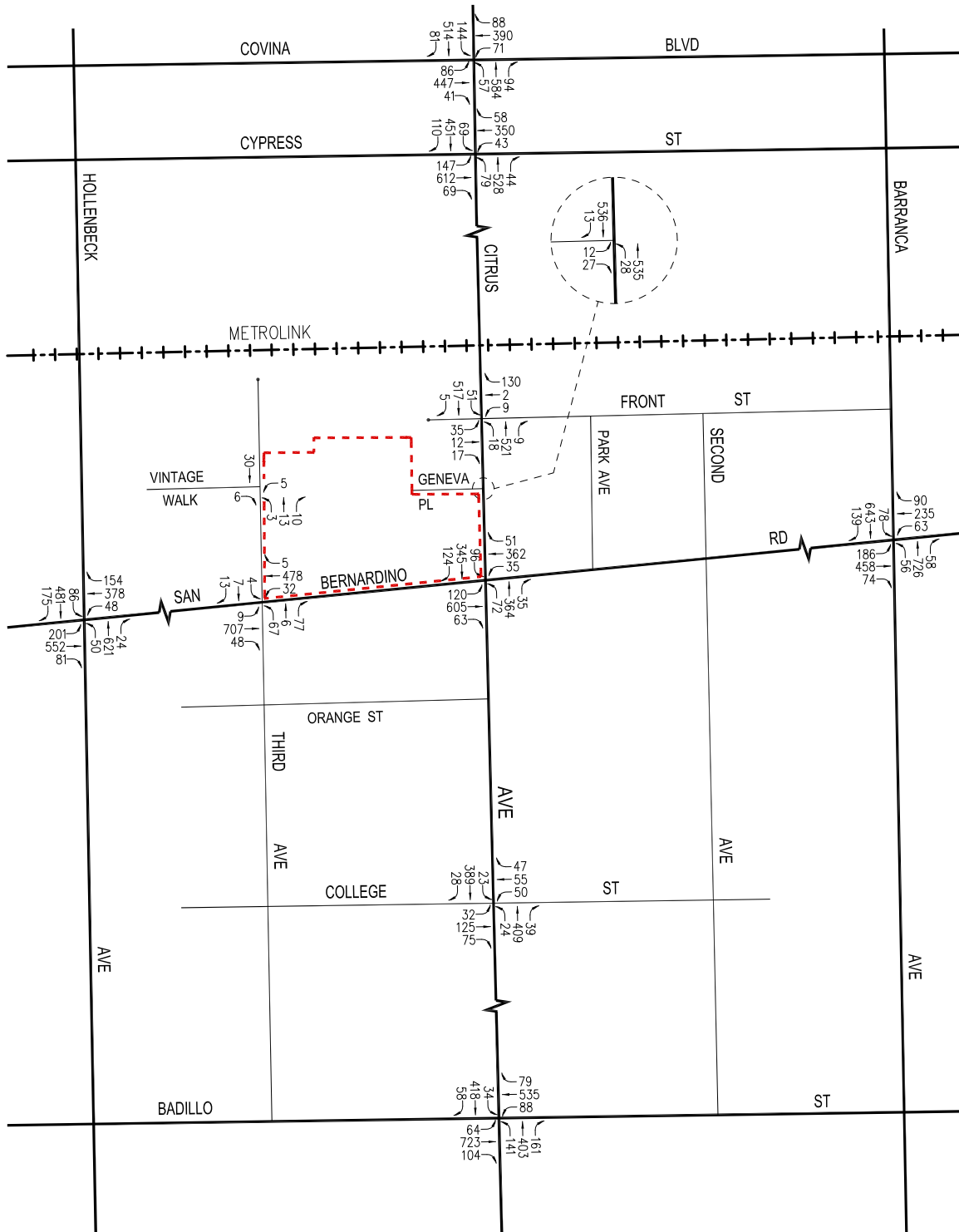
Covina Hassen Development Project (Site A)

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Future with Project Traffic Volumes: Weekday AM Peak Hour

INTENTIONALLY LEFT BLANK





 NOT TO SCALE
  PROJECT SITE

SOURCE: Linscott, Law & Greenspan, Engineers 2019

FIGURE 3.17-12

Future with Project Traffic Volumes: Weekday PM Peak Hour
 Covina Hassen Development Project (Site A)

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Congestion Management Program Traffic Impact Assessment

The applicable congestion management program (CMP) for the project area and the surrounding metropolitan area is the Los Angeles County Metropolitan Transportation Authority's 2010 CMP. This program monitors and sets performance indicators for a transportation network of numerous highway segments, freeways, and key roadway intersections throughout Los Angeles County (called the CMP Highway and Roadway System). The CMP requires analysis of a project's effects on CMP facilities if the project would add 50 or more trips to a CMP intersection or more than 150 trips to a CMP mainline freeway in either direction during the AM or PM weekday peak hours. As discussed in the Traffic Impact Study (Appendix H), the project is not expected to add 50 or more trips during either weekday AM or PM peak hours at CMP monitoring intersections. Further, the project is not expected to add 150 or more trips (in either direction) during either the weekday AM or PM peak periods to CMP mainline freeway monitoring locations. No further analysis of CMP intersections or freeway mainline segments is required per the Los Angeles County CMP guidelines, indicating that the project trip generation falls below the thresholds established in the CMP and is, therefore, not anticipated to result in significant impacts at CMP monitoring locations.

Conclusion

As shown in Table 3.17-3, application of the City's threshold criteria indicates that the proposed project is not expected to create significant impacts at any of the study intersections under the Existing with Project or Future with Project scenarios. Incremental, but not significant, impacts are noted at the study intersections. All study intersections would remain at LOS D or better in both peak hours. Additionally, the proposed project would not conflict with Los Angeles County CMP guidelines. As such, impacts would be **less than significant**. No mitigation is required.

b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less Than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), lists the criteria that must be used for applying VMT analysis to development project and for determining the significance of transportation impacts under VMT criteria. Section 15064.3, subdivision (b) is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The proposed project is mixed-use project, which would include the construction of 161 townhomes, 13,500 sf of retail space, and 3,800 sf of restaurant uses. The proposed project would generate temporary construction-related traffic and would generate 1,700 daily trips during operation (Appendix H).

As previously stated, the guidelines shall applied by all lead agencies, statewide, by July 1, 2020, and at this time, the City has not yet implemented VMT as a primary traffic evaluation methodology. As such, the proposed project's potential to impact transportation and circulation has been evaluated with the City's current Traffic Impact Analysis Guidelines (based on LOS). Because the City has not adopted the use of VMT pursuant to SB 743, the proposed project would be evaluated according to CEQA Guidelines Section 15064.3, subdivision (b)(3), qualitative analysis. This guideline recognizes that lead agencies may not be able to quantitatively estimate VMT for every project type. In those circumstances, this subdivision encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

As stated above in Transportation Setting, the proposed project is located in close proximity to both public bus and rail service. Transit service in the project area is provided by Foothill Transit, Metro, and the City of Glendora. Foothill Transit operates one north-south route along Citrus Avenue. Line 281 connects the City of Industry to the City of Glendora, providing two northbound and two southbound buses in the project study area during the AM and PM peak hours. Metro operates one east-west route along Badillo Street and Citrus Avenue. Line 190 connects the City of El Monte to Cal Poly Pomona, providing up to four eastbound and five westbound buses in the project study area during the AM and PM peak hours. The City of Glendora operates a Commuter Shuttle that connects to the Covina Metrolink Station via Front Street and Citrus Avenue, providing up to two buses in the AM and PM peak hours.

Metrolink provides a rail stop located approximately 500 feet northeast of the project site for the San Bernardino Line, which extends between Union Station in Downtown Los Angeles and the City of San Bernardino. This Metrolink stop would therefore provide connectivity between the proposed project and the regional network of rail lines operated by Amtrak, Metro, and the Southern California Regional Rail Authority. The Covina Metrolink Station is located north of Front Street on the east side of Citrus Avenue and connects with the public bus transit services provided on Citrus Avenue. During the weekday AM peak hour, five trains per hour are provided at the Covina station: four travel westbound to Los Angeles Union Station, and one travels eastbound to the City of San Bernardino. During the weekday PM peak hour, four trains per hour are provided at the Covina station: three travel eastbound to the City of San Bernardino, and one travels westbound to Los Angeles Union Station.

In addition to readily available public transit, the proposed project would provide enhanced pedestrian and bicycle amenities. The proposed project would provide a combination of landscape and hardscape improvements that facilitate internal accessibility and encourage active transportation. Such improvements reflect the circulation objectives stated in the TCSP. The project site is accessible from surrounding land uses and nearby public transportation (Metrolink) as well as via public sidewalks on Citrus Avenue, 3rd Avenue, and San Bernardino Road. Additionally, the proposed project would include pedestrian access points, pedestrian plazas along San Bernardino Road and 3rd Avenue, and pedestrian amenities within the site such as landscaped walkways, benches, a turf/lawn area, and courtyards (see Figure 2-2).

Bicycle access to the project site would be provided by the existing street network. The City of Covina Bicycle Master Plan proposes a number of bicycle facilities near, or immediately adjacent to, the overall project site (City of Covina 2011). The proposed facilities within an approximate one-quarter mile radius include:

- Fourth Avenue: Class III Bike Route from San Bernardino Road to Puente Street
- Citrus Avenue: Class II Bike Lane north of Front Street and south of Badillo Street
- Second Avenue: Class II Bike Lane from Front Street to Rowland Avenue
- Edna Place: Bicycle Boulevard from Azusa Avenue to First Avenue
- Front Street: Class II Bike Lane from Citrus Avenue to Second Avenue
- San Bernardino Road: Class II Bike Lane west of Hollenbeck Avenue and east of Second Avenue, Class III Bike Route from Hollenbeck Avenue to Second Avenue
- Badillo Street: Class II Bike Lane from Lark Ellen Avenue to Cypress Street

The project is well located to further facilitate and encourage bicycling as a mode of transportation as these facilities are constructed.

In summary, the proposed project is conveniently located in close proximity to public transit and would provide increased pedestrian and bicycle activity, all of which would contribute to reducing the proposed project's VMT. As such, impacts would be **less than significant** and no mitigation is required.

c) ***Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

Less Than Significant Impact. With exception of the closure of the Local street, Geneva Place (which was found to not have a significant traffic impact), the proposed project would not modify any other existing roadways leading to the site and would not involve construction of structures that would cause transportation hazards. All access points would be designed in accordance with the City's Municipal Code and Design Standards. Therefore, the proposed project would not substantially increase roadway hazards due to design features. The proposed project would involve construction of a mixed-use development in a commercial area that has been designated and planned for such uses. As such, development of the proposed project would not introduce incompatible uses to the project area having the potential to contribute to hazardous roadway conditions. Impacts would be **less than significant**. No mitigation is required.

d) ***Would the project result in inadequate emergency access?***

No Impact. Emergency access to the project site is currently provided via Citrus Avenue, San Bernardino Road, and 3rd Avenue. While driveway configurations would slightly change under the proposed project (see the discussion under Section 2.3), emergency access would still be provided via these roadways. Additionally, the proposed project has been designed with required clearance for emergency access to the proposed buildings. As described in Sections 3.9 and 3.15, the proposed project's plans would be reviewed by LACFD as part of the plan check process, ensuring that emergency access is provided per LACFD requirements. As such, the project would not result in inadequate emergency access. **No impact** would occur.

References:

City of Covina. 2004. *Covina Town Center Specific Plan*. Accessed, April 4, 2019. https://covina.gov/sites/default/files/fileattachments/planning_commission/page/1074/towncenterspecificplanfinal.pdf.

City of Covina. 2011. *City of Covina Bicycle Master Plan*. Accessed, April 5, 2019. https://covina.gov/sites/default/files/fileattachments/community_development/page/1253/covina_bicycle_master_plan_approved_092011.pdf.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

Less Than Significant Impact. As described under Section 3.5 of this IS/MND, a CHRIS records search was conducted for the project site and surrounding area. No tribal cultural resources were identified as a result of the records search. The NAHC conducted a Sacred Lands File search for the project, which was completed with negative results. Additionally, no specific tribal cultural resources were identified by California Native American tribes as part of the City's AB 52 notification and consultation process (see Section 3.18(a)(ii) below for a description of this process). Therefore, the proposed project would not adversely affect tribal cultural resources that are listed or eligible for listing in the state or local register. Impacts would be **less than significant**, and no mitigation is required.

- ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less Than Significant with Mitigation Incorporated. There are no resources in the project area that have been determined by the lead agency to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. Further, no specific tribal cultural resources were identified in the project area by the NAHC, by California Native American tribes, or by the City as part of the AB 52 notification and consultation process. On March 2, 2016, notification of the proposed project was sent to California Native American tribal representatives that have requested to receive project notifications pursuant to AB 52 from the City and that are on file with the NAHC as being traditionally or culturally affiliated with the geographic area. To date, no response(s) to the notification letters have been received.

Due to the absence of previously recorded tribal cultural resources on the project site and because no specific tribal cultural resources have been identified by California Native American tribes through the AB 52 consultation process, the City has determined that no tribal cultural resources are present in the project area. However, previous correspondence received from the Gabrieleño Band of Mission Indians-Kizh Nation for other projects in the area suggests that there is some potential for unknown subsurface tribal cultural resources to be impacted by the project. In the event that unknown subsurface tribal cultural resources are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. As such, mitigation measure **MM-TCR-1** has been set forth to protect tribal cultural resources, in the event that any are discovered during project construction. Upon implementation of **MM-TCR-1**, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-TCR-1 The project applicant shall retain the services of a tribal monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation, who will be present on site during the construction phases that involve ground disturbing activities. Ground disturbing activities are activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The tribal monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the tribal representatives and monitor have indicated that the site has a low potential for impacting tribal cultural resources.

References

None.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less Than Significant Impact. The proposed project would involve the development of 161 new townhomes; 17,300 sf of retail/restaurant space; and 46,679 sf of associated landscaping and outdoor areas. As such, the proposed project would increase the intensity of uses on the project site, resulting in increased water demand, wastewater generation, electricity usage, and natural gas usage. The project would also introduce demand for telecommunication facilities to the project site.

Water

Construction

Proposed project construction would result in temporary increases in water use in the project area, since water would be required for dust control, concrete mixing, etc. However, temporary, minor increases in water use in the project area during the construction phase of the project would not result in the need for new or expanded water and/or wastewater facilities.

Operation

CalEEMod default water usage rates were used to estimate the anticipated water demand of the proposed project. Based on the CalEEMod generation rates, water use per day during project operation would be approximately 54,638 gallons per day (gpd) (Appendix B).

The proposed project would connect to existing water mains located in Geneva Place and San Bernardino Road. The project site is within the water service boundaries of the City's Water Utility Division. The City's Water Utility Division serves potable water to more than 3,000 customers in the City of Covina and portions of the City of West Covina, as well as an unincorporated portion of Los Angeles County. According to the City's 2015 Urban Water Management Plan (UWMP), the reliable quantities of projected water supply for Year 2020 and Year 2025 are 5,705 acre-feet per year (ac-ft/yr) and 5,762 ac-ft/yr, respectively. As estimated above, the project would consume approximately 54,638 gpd of water, which equates to approximately 19.9 million gallons of water per year, or 61 ac-ft/yr. The estimated water consumption of the proposed project is, therefore, approximately 1% of the Water Utility Division's projected water supply for 2020 and 2025 and would not, therefore, significantly impact existing water service such that new water facilities or relocated water facilities would be required. Furthermore, the project site would be redeveloped in compliance with CALGreen (which implements water efficiency standards for appliances and fixtures), which would ensure that water usage is minimized.

The proposed project would be required to pay water connection fees. Providers would use these fees, at least in part, to fund projects and programs necessary to meet their regulatory obligation with respect to treatment requirements, treatment capacity, and supply reliability. For these reasons, the proposed project would not require or result in the construction of new water facilities.

Wastewater

Construction

Wastewater produced during construction of the proposed project would be discharged to the local municipal sewer system or hauled off site. However, such discharges would be minimal and temporary in nature and would comeingle with wastewater in the municipal sewer collection system prior to being treated at a regional wastewater treatment plant. As such, construction of the proposed project would not result in the need for need or expanded wastewater facilities.

Operation

Wastewater generation on site is estimated to be equivalent to indoor water demand. As such, the project would generate approximately 34,600 gpd of wastewater (Appendix B). The proposed project would connect to existing 8-inch sewer mains located in Geneva Place, 3rd Avenue, and San Bernardino Road, which discharge into Los Angeles County Sanitation District (LACSD) trunk lines for transmission, treatment and disposal (City of Covina 2014). The water reclamation plants serving the City (and thus the project site) include the San Jose Creek Water Reclamation Plan (SJCWRP) and the Joint Water Pollution Control Plant (JWPCP). The SJCWRP has the capacity to provide tertiary treatment for approximately 100 million gpd and serves a largely residential population of approximately one million people. The JWPCP currently has the capacity to provide primary and secondary treatment for approximately 300 million gpd and serves a population of about 3.5 million people. Based on the capacities of the SJCWRP and JWPCP, the wastewater generated by the proposed project would be nominal (less than 0.01%). As such, the proposed project would not exceed current capacities of the wastewater treatment system and would not significantly impact existing wastewater treatment systems such that new facilities would be required.

Stormwater

Construction

As stated in Section 3.10, construction of the proposed project would result in ground surface disruption during grading and excavation, temporarily altering the stormwater drainage pattern of the project site during construction. However, compliance with the project-specific SWPPP and the erosion and sediment control plan that are required per Municipal Code Section 8.50.100 (specifically the use of run-off control devices) would ensure that stormwater runoff is minimized during construction, to the extent practicable. Implementation of BMPs set forth in the project's SWPPP and the erosion and sediment control plan would ensure that a less than significant impact would occur to stormwater drainage infrastructure during construction.

Operation

The proposed project is not expected to generate increased stormwater runoff. As described under Section 3.10, the drainage patterns of the site would not substantially change relative to existing conditions. The addition of on-site landscaping would reduce the amount of runoff from the sites. Additionally, in accordance with Municipal Code Chapter 8.50 and with the current Los Angeles Municipal NPDES permit, the project applicant has prepared a LID Plan for the project. The LID Plan prepared for the project outlines BMPs that would minimize urban runoff to the extent feasible, reduce the project site's impervious areas, and minimize directly connected impervious surfaces. These BMPs include, but are not limited to, the implementation of drain inserts, infiltration trenches, efficient landscaping irrigation systems, and drainage facility inspection and maintenance protocol during operation.

Compliance with Municipal Code Section 8.50.120 and with the proposed project's LID plan would reduce the peak volume of stormwater runoff discharged into the MS4, as well as the potential for pollutants to enter the MS4. Additionally, due to the impervious nature of the underlying soils at the project site, the LID Plan includes the implementation of a proprietary filter system, which would simulate the natural bio-filtration process. The filter system would treat storm water on a flow-based value. The proposed project would drain roof runoff to landscaped areas where it would enter an area drain system leading to the City's

storm drain system which tie into the 48-inch storm drain on San Bernardino Road. Similarly, the paved streets and driveways of the proposed project would drain into catch basins, which would drain into the City's storm drain system via underground infiltration chambers. Compliance with Municipal Code Chapter 8.50 would reduce the peak volume of stormwater runoff discharged into the City's storm drain system and would ensure that stormwater is retained on site, to the extent feasible. For these reasons, the proposed project would not require the construction or expansion of off-site storm water drainage facilities, as the project would not contribute a substantial amount of new stormwater runoff relative to existing conditions.

Electric Power

Electricity to the project site is supplied by SCE via transmission lines on San Bernardino Road, 3rd Avenue and Geneva Place (SCE 2019). According to the CalEEMod generation rates, project operation would consume approximately 1,840,108 kilowatt-hours per year (kWh/yr) of electricity. The proposed project would be connected to existing electricity utility infrastructure. The proposed project would be required to comply with CALGreen standards, and would include the installation of solar panels on the rooftop of the mixed-use building, which would ensure that electricity consumption is minimized. The increase in electricity demand associated with the project would be minor to negligible in the context of regional electricity demand. For these reasons, construction of new or expanded electrical facilities is not anticipated to be required as a result of the project.

Under existing conditions, there are 70-foot transmission poles and associated 66 kv lines along Geneva Place. With coordination and approval from SCE, the existing transmission poles would be protected in place during project construction and, as such, no significant, adverse environmental effects would occur as a result of the proposed project.

Natural Gas

Natural gas is provided by the Southern California Gas Company (SoCalGas). SoCalGas provides natural gas to the project site via natural gas lines in 3rd Avenue and Citrus Avenue via a high pressure distribution line in Edna Place, approximately 500 feet north of the project site (SoCalGas 2019). Construction of the proposed project is not anticipated to use natural gas.

According to the CalEEMod projections, the proposed project would consume approximately 3,664,458 kBTU per year of natural gas upon operation. The proposed project would coordinate with SoCalGas to connect to existing natural gas lines in 3rd Avenue and Citrus Avenue. Utility connections are considered part of the proposed project and are analyzed in this IS/MND for potential environmental effects. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project. The proposed project would be required to comply with CALGreen standards, which would ensure that natural gas consumption is minimized. Compliance with 2016 CALGreen standards would likely mean that the project would require less energy than other multi-family and commercial buildings in the surrounding area. The proposed project is not expected to require substantial amounts of energy such that new or expanded natural gas facilities are required.

Per Municipal Code 17.64.040A(19), the project site plans, including the location of any natural gas lines, would be subject to the City's review and approval.

Telecommunication

Frontier Communications currently provides telecommunication services to the City, and to the project site. As such, the project site is in an area with existing telecommunication facilities. Connections to existing infrastructure would be made during construction and are considered part of this project. As such, impacts of such connections have been analyzed for their effects in this IS/MND. As demonstrated throughout this document, significant environmental impacts would not result from the proposed project. Per Municipal Code 17.64.040A(19), the project site plans, including the location of any new telecommunication facilities would be subject to the City's review and approval. During project operation, Frontier Communication's existing local maintenance and operations group would continue to ensure telecommunication services reach the project area and the City of Covina without the need for expansion or construction of new facilities. As such, the proposed project is not expected to require construction, expansion, or relocation of telecommunications facilities.

In summary, due to the urbanized nature of the project area, utilities are available in the area. The proposed project would include the connection to these existing utilities but, as explained above, is not expected to involve new construction, expansion, or relocation of utility infrastructure. The connections required for the project are included as part of the project and analyzed for environmental effects in this IS/MND. As demonstrated herein, the proposed project is not expected to result in significant impacts on the environment. Impacts would be **less than significant** and no mitigation is required.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Less Than Significant Impact. As discussed in Section 3.19(a), the proposed project would connect to municipal water service provided by the City's Water Utility Division. The primary water provider for the City is the Covina Irrigating Company, which obtains water from the Main San Gabriel Groundwater Basin and from the San Gabriel River. Metropolitan Water District of Southern California serves as the City's back-up water supplier. Metropolitan Water District's primary sources of water are the Colorado River and Northern California. This water is provided to the City through Three Valleys Municipal Water District.

As discussed in Section 3.10(b), the proposed project operation is anticipated to require approximately 54,638 gpd of water. The estimated water consumption of the proposed project is 1% of the Water Utility Division's projected water supply for 2020 and 2025. Thus, the Water Utility Division would have sufficient supplies to serve the proposed project and reasonably foreseeable future development (subject to separate environmental approval) during years with normal precipitation.

During periods of dry and multiple dry years, the City's ability to supply water from groundwater and treated surface water purchased from the Covina Irrigating Company would not be compromised (City of Covina 2015). Given this, and given that the proposed project's water demand would comprise 1% of the City's total demand, the proposed project would have a less than significant impact on the City's water utility in periods of dry and multiple dry years.

Additionally, the proposed project would be required to pay development impact fees to offset any project impacts to existing infrastructure. Further, the project site would be redeveloped in compliance with CALGreen, which implements water efficiency standards for appliances and fixtures and would minimize project water usage. While the project would increase water demand at the site, the Water Utility Division is expected to have sufficient water supplies to serve the proposed project and reasonably foreseeable development. Impacts would be **less than significant**, and no mitigation is required.

- c) *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less Than Significant Impact. As previously discussed in Section 3.19(a), the proposed project would connect to water service provided by the City's Water Utility Division and would deliver sewage into the City's sewer collection system operated and maintained by the Sewers Maintenance Division of the City's Public Works Department and treated by the LACSD. Both water reclamation plants serving the City and thus the project site are served by the SJCWRP and the JWPCP reclamation plants. The wastewater generated by the proposed project would be nominal and would not exceed current capacities of these wastewater plants, as described and substantiated under Section 3.19(a). As such, impacts would be **less than significant**. No mitigation is required.

- d) *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less Than Significant Impact. Solid waste disposal services for the project site would be provided by Athens Services (Athens). Athens offers waste and recycling collection, green waste recycling programs, organics waste composting, special waste transportation, and transfer and materials recovery services to the City as well as many other areas in Southern California. The proposed project would include the development of multi-family residential units, commercial uses, outdoor/landscaped areas, a parking structure, and surface parking areas. Based on the CalEEMod solid waste generation rates, the proposed project would generate approximately 64 tons of solid waste per year during operation (Appendix B).

Solid waste generated by the proposed project would be collected by Athens and transported to a local or regional landfill. Athens uses regional landfills in Los Angeles County and San Bernardino County to dispose of waste from its collection, transfer, and disposal services. Los Angeles County landfills have an estimated remaining permitted capacity of 167,580,000 tons. The remaining life of Los Angeles County landfills ranges from approximately 10 years to 30 years (County of Los Angeles 2019). San Bernardino County landfills have an estimated remaining permitted capacity of 164,209,140 tons (County of San Bernardino 2018). Both counties have planned for adequate capacity to accommodate waste disposal needs for expected future growth (County of Los Angeles 2019; County of San Bernardino 2018). The solid waste that is anticipated to be produced by the proposed project each year (approximately 64 tons per year) would be negligible relative to the remaining permitted capacity of Los Angeles County and San Bernardino County landfills. It is anticipated that one of the landfills used by Athens would have sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.

The Environmental Services Division of the City requires that at least 75% of all building and demolition materials (wood, metal, electrical, piping, glass, drywall, asphalt, concrete) be recycled for purposes of compliance with the California Integrated Waste Management Act of 1989 (City of Covina 2019). Required compliance with this regulation would reduce the project's solid waste generation during construction. For these reasons, solid waste impacts resulting from the construction and operation of the proposed project would be considered **less than significant**. No mitigation is required.

e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Less Than Significant Impact. The proposed project would be required to comply with all applicable federal, state, and local agency regulations related to solid waste, including: AB 939, the Integrated Waste Management Act of 1989; AB 341, the Commercial Recycling Bill; and, AB 1826, which pertains to mandatory organics recycling. These regulations set out the ambitious goal of 75% recycling, composting, and source reduction of solid waste by 2020. Waste generated by the proposed project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 939, AB 341, or AB 1826. The proposed project's waste generation would represent a nominal percentage of the waste created within the City, and the City is required to comply with state solid waste laws. Therefore, impacts associated with compliance with solid waste regulations would be **less than significant**. No mitigation is required.

References

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3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As described in Section 3.9(g), the proposed project is generally located in an urbanized environment with little potential for wildland fires. The closest Very High Fire Hazard Severity Zone is located approximately 1.6 miles southeast of the project site, in the Covina Hills. The closest state responsibility area is also located in the Covina Hills, approximately 2 miles southeast of the project site. The project site is separate from these areas by urban development and several major roadways (CAL Fire 2019). As such, wildfire hazards at the project site are unlikely.

As stated in Section 3.9(f), the City has prepared the “Covina Emergency Plan” for emergency response within the City. The multi-hazard Covina Emergency Plan addresses the City’s planned response to emergencies associated with natural disasters and hazardous materials incidents (City of Covina 2000). The proposed project would be required to comply with the multi-hazard Covina Emergency Plan. In the event of a disaster, the City’s emergency plan would go into immediate effect. According to the City’s General Plan Safety Element, all major public streets serve as the principal evacuation routes. These principal routes are well maintained to support an evacuation function to the extent feasible (City of Covina 2000). San Bernardino Road and Citrus Avenue, which are both adjacent to the project site, would thus be

considered emergency evacuation routes. During construction-related activities, traffic along San Bernardino Road and Citrus Avenue may experience slight delays due to temporary lane closures, as well as the movement of construction workers and construction equipment to and from the project site. However, these delays would be temporary in nature and any lane closures would be implemented according to state and local traffic control regulations. As such, project construction would not impair implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The proposed project would involve vacation of a portion of Geneva Place. The vacated portion would be developed into a central courtyard and emergency vehicle access driveway under the proposed project. Geneva Place is a local connector street, which does not serve as an emergency evacuation route under existing conditions, and, as such, its removal would not impede an emergency response or evacuation plan. Furthermore, the vacated portion of Geneva Place would still provide emergency vehicle access to the proposed project. Upon project operation, the LACFD would provide emergency response services to the project site. The proposed site plans, including the access driveways, would be reviewed and approved by the LACFD during plan check review. Adherence to LACFD requirements would ensure that the proposed project would not substantially interfere with emergency response or evacuation. For these reasons, impacts related to emergency plans would be **less than significant**. No mitigation is required.

- b) ***Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

Less Than Significant Impact. The project site is located on relatively flat terrain within an urban setting and is surrounded by developed land uses, including residential land uses to the north and west and commercial land uses to the east and south. The nearest hillsides and wildland areas are located at the bottom of the San Gabriel Mountains, approximately four miles north of the project site, and the Covina Hills, approximately two miles south of the project site. In the unlikely event of a fire emergency at the project site due to wildfires, the LACFD, specifically Fire Station 154 (401 North Second Avenue), Fire Station 153 (1577 East Cypress Street), and Fire Station 152 (807 West Cypress Street), all located in Covina, would provide fire protection services. Additionally, the proposed project would not include any structures or land uses that would exacerbate wildfire risk. Due to the intervening distance and urban development that lays between the project site and wildland areas, implementation of the proposed project is not likely to exacerbate wildfire risks such that project occupants are exposed to pollutant concentrations or the uncontrolled spread of a wildfire. As such, impacts would be **less than significant**. No mitigation is required.

- c) ***Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Less Than Significant Impact. As stated in Section 3.19, the proposed project would connect to the existing underground utility infrastructure, including an 8-inch sewer line and existing water mains located in Geneva Place and San Bernardino Road. During the installation of new underground utility connections, minor interruptions to public utilities may occur as a result of the project; however, these interruptions would be brief and intermittent. Furthermore, construction of these connections is analyzed as part of the proposed project, and potential impacts to the environment are shown to be less than significant throughout this IS/MND. Pipelines would be located underground and would not exacerbate fire risk. The existing aboveground power lines in Geneva Place would be protected in place, and thus, would not exacerbate fire risk compared to existing conditions.

Although new internal driveways are planned as part of the proposed project, these access routes would be built according to California Building Code 17.124.070, and thus would provide efficient ingress/egress for emergency vehicles.

Given the above, the proposed project would not include the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Given this, impacts would be **less than significant**. No mitigation is required.

d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less Than Significant Impact. The project site is located within a highly developed urban area and is located on relatively flat terrain. The project site is not located within a flood or landslide hazard zone (Appendix D; FEMA 2008). The nearest hillside areas that are susceptible to flood and/or landslide are within South Hills Park, located in the City of Glendora and approximately 2.5 miles north of the project site, and the Covina Hills, located approximately 2 miles southeast of the project site (DOC 2019). Construction of the proposed project would result in ground surface disruption during grading and excavation, temporarily altering the drainage pattern of the project site during construction. However, compliance with the project-specific SWPPP and erosion and sediment control plans that are required per Municipal Code Section 8.50.100 (specifically the use of run-off control devices) would ensure that the risk of flooding on- or off-site is minimized during construction, to the extent practicable. Upon operation, the on-site runoff and drainage patterns would be similar to existing conditions.

Given the relatively flat topography of the project site, the distance of the project site from flood and landslide areas, and the sufficiency of on-site drainage, impacts related to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would be **less than significant**. No mitigation is required.

References

- CAL FIRE (California Department of Forestry and Fire Protection). 2019. Fire Hazard Severity Zone Viewer. Web map application. Accessed July 15, 2019. <https://egis.fire.ca.gov/FHSZ/>.
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- DOC (California Department of Conservation). 2019. Geologic Hazards Data and Maps. Accessed, June 10, 2019. <https://maps.conservation.ca.gov/geologic/hazards/>.
- FEMA (Federal Emergency Management Agency). Flood Map Service. 2008. Accessed, June 7, 2019. <https://msc.fema.gov/portal/search?AddressQuery=137%20west%20san%20bernardino%20road#searchresultsanchor>.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

Less Than Significant with Mitigation Incorporated. As discussed in Section 3.4, of this IS/MND, the project site is located in a completely developed and urbanized area, and does not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. Additionally, the project area does not function as a corridor for the movement of native or migratory wildlife. All activities associated with the proposed project would be conducted in the highly urbanized environment of the project area. Construction noise has the potential to disturb nesting birds potentially nesting in the trees associated with the Vintage Walk condominium development across 3rd Avenue. Additionally, construction could disturb or harm nesting birds using the ornamental vegetation on the project site's northern perimeter. However, these impacts would be temporary in nature and would be reduced to below a level of significance with implementation of **MM-BIO-1**. As such, impacts to biological resources resulting from the proposed project would be **less than significant with mitigation incorporated**. No further mitigation is required.

As described in Section 3.5 of this IS/MND, the proposed project site does not support any important examples of major periods in California history or prehistory. However, the presence of Gabrieleno villages in the surrounding area indicates that the project area may be sensitive for buried cultural resources (Appendix C). As such, there is a possibility of encountering previously undiscovered cultural resources at subsurface levels during ground-disturbing activities associated with the proposed project. Implementation of mitigation measure **MM-CUL-1** and **MM-TCR-1** would ensure that any uncovered archaeological resources and/or tribal cultural resources are protected. Additionally, in the unlikely event that excavation activities during construction inadvertently uncover buried human remains, implementation of **MM-CUL-2** would ensure that such remains are treated appropriately. As such, after mitigation, the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Less Than Significant with Mitigation Incorporated. The proposed project would result in potentially significant project-level impacts involving Biological Resources, Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources. However, mitigation measures have been identified that would reduce these impacts to less than significant levels. Furthermore, the Air Quality and Transportation analyses presented in Section 3.3 and Section 3.17 of this IS/MND consider cumulative impacts and have determined that cumulative air and traffic impacts would be less than significant. All reasonably foreseeable future development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City’s General Plan and by the regulations established in the City’s Municipal Code. Therefore, compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the proposed project would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. Cumulative impacts would therefore be **less than significant with mitigation incorporated**. No further mitigation is required.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant with Mitigation Incorporated. As detailed throughout this IS/MND, the proposed project would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials, public services, or transportation. However, as described in Section 3.13, the proposed project could result in potentially significant impacts in the category of noise, during both construction and operation of the project. With implementation of mitigation measures **MM-NOI-1** through **MM-NOI-4**, this impact would be reduced to a less than significant level. As such, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

References

None.

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4 Preparers

4.1 List of Preparers

Lead Agency

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